

Privacy Policy

Words defined in capitalized terms shall have the same meaning set forth herein or in the Terms and Conditions of Usage..

SCOPE AND PURPOSE

This policy is applicable to the Processing of users' Data at Krutrim SI Designs Private Limited ("Krutrim", "our", "us" or "we"). The purpose of this policy is to provide our users' (jointly referred to as "users" or "you") with a general understanding of:

- Type of Data we collect
- Purpose of collecting Data
- How we process your Data How we share or transfer Data.
- Distribution of responsibility for the Processing of Data between affiliates of Krutrim; and
- Our contact details through which you can raise concerns about collection, storage and processing of your Data.

We update policy routinely so that it reflects the measures taken by us in relation to your Data.

DEFINITIONS

The following definitions are used in this policy. In case of any conflict with respect to interpretation of these definitions between applicable law and these terms, interpretation provided under the applicable law shall prevail.

Anonymous data or anonymized data - This is the category of data which is not identifiable to a natural person. Even if coupled with other information, identification of such a natural person is impossible.
Automated decision making- Automated decision making is the process of making a decision by automated means through algorithms without any human involvement. These decisions can be based on factual data, digitally created profiles or through data inferred.

Consent - Any freely given, informed and unambiguous statement which may be given by a clear affirmative action may be referred to as consent.

Cookies - cookie is a small piece of data given to a web browser by a web server. The browser stores the data in a text file so it can be sent back to the server each time the browser requests a page from the server. Cookies have the capacity to store some of your personal data. For more details on what cookies we use and what personal data we store through the use of cookies you may refer to our cookie policy [here](#).

Data means Personal Data and Other Data.

Data Fiduciary- Any natural or legal person that alone or jointly with others, determines the purposes and means of the processing of personal data. For the purposes of this privacy policy Krutrim SI Designs Private Limited is the data fiduciary of data.

Data Processor - The natural or legal person who processes personal data of data principals on behalf of the data fiduciary.

Data Principal- is the natural person who interacts with us and whose personal data we collect in accordance with the provisions of this privacy policy.

Deletion - the irretrievable obliteration or destruction of your saved personal data stored with us, such that your re-identification through this data becomes impossible.

Other Data - means data other than Personal Data.

Personal Data - This refers to any information identified or identifiable to a natural person ('data principal'). This refers to any direct or indirect identification of a natural person. This also includes any inference drawn from such data about the data principal.

Processing- It means any operation or set of operations, performed on personal data or sets of personal data, including but not limited to processing by automated means. This may include collection, recording, structuring, alteration, adaptation, organization, use, disclosure, dissemination, alignment or combination and analysis of your personal data. Data anonymization is also a form of processing.

Pseudonymization - A processing technique where the processed data is not identifiable to a natural person unless coupled with some other information. This data is kept separately with technical and security standards since this data may be converted personal data.

Third Party - 'third party' means a natural or legal person, public authority, agency or body other than the data principal, data fiduciary, processor and persons who, under the direct authority of the data fiduciary or processor, are authorized to process personal data;

DETAILS OF THE DATA FIDUCIARY/JOINT DATA FIDUCIARY

Krutrim SI Designs Private Limited and its subsidiaries (the 'Company', 'we' or 'us') having its registered office at 8th Floor, Wing C, Prestige RMZ Startech Block C, Industrial Layout, Hosur Road, Koramangala, Bengaluru, Karnataka, 560095, India is the data fiduciary under this Privacy Policy. The Company is in the business of researching, designing, developing AI applications and AI solutions by using cloud infrastructure to provide unique AI solutions to its customers/users.

DATA PROTECTION OFFICER

If you have any queries under this Privacy Policy or want clarification about our processing of your Personal Data, you can connect with our Data Protection Officer at dpo@olakrutrim.com. We will resolve your queries within one calendar month.

TYPE OF Data AND MANNER OF COLLECTION

User sign-up consent

Automatic data collection

We may automatically log and combine information about you, your computer or mobile device, and your interaction over time with the Services, online resources and our communications, such as:

- Anonymised device data such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, device type (e.g., phone, tablet), IP address, language settings and general location information such as city, state or geographic area.
- Anonymised online activity data such as pages or screens you viewed, how long you spent on a

page or screen, the website you visited before browsing to the Services, navigation paths between pages or screens, information about your activity on a page or screen, access times, duration of access, and whether you have opened or otherwise engage with our communications.

We use cookies, local storage technologies and web beacons for automatic data collection but we do not collect any Personal Data using such cookies

Sensitive data:

You may choose to provide personal sensitive information. This includes, but is not limited to, your religious views, race, sexual orientation, political views, health, racial or ethnic origin, philosophical beliefs, or trade union membership. By providing sensitive information, you consent to our use of it for the purposes set out in this Privacy Policy.

This is information about you that you may give to us by entering information via our websites, our mobile app, or by corresponding with us by phone, email or otherwise and is provided entirely voluntarily. The information you give us includes your name, contact details (such as phone number, email address and address), etc., for example provided at the time of registering with our Service.

You are free to opt-in or opt-out to the use of cookies when you first visit the Website or use the App. You can choose, at the time of opting in, for what purposes the Cookies would be used. Consent, once provided, can be withdrawn at any time by altering your cookie preferences in the browser or in your App. The retention period of cookies is limited and differs per cookie. Disabling cookie collection through your browser or device or changing your consent but this may cause some features of the Services not functioning properly and we will not be able to send customized and relevant communication or promotional messages to you. We do not collect any Personal Data using cookies.

PURPOSE OF COLLECTION AND PROCESSING OF OTHER DATA

We do not ask for, collect or process Personal Data except those being provided to us voluntarily by you.

Provide our Services- We use Data to operate, maintain, and provide you with our Services. In particular, we use Data to perform our contractual obligations under our Terms of Service.

Communicate with you about our Services- It is in our legitimate business interests to use your information to respond to your requests, provide user support, and communicate with you about our Services, including by sending announcements, surveys, reminders, updates, security alerts, and support and administrative messages.

Improve, monitor, personalize, and protect our Services- It is in our legitimate business interests to improve and keep our Services safe for our users, which includes:

- Understanding your needs and interests, and personalizing your experience with the Services and our communications.
- Troubleshooting, testing, and research, and keeping the Services secure.
- Investigating and protecting against fraudulent, harmful, unauthorized, or illegal activity.

Research and development- We may use Data for research and development purposes where it is in our legitimate business interests, including to analyze and improve the Services and our business. As part of these activities, we may create or use aggregated, anonymous or other anonymized data from Data we collect. We make Data into anonymized data by removing information that makes the data personally identifiable to you. We may use this anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business interest.

Compliance and protection- We may use Data to comply with legal obligations, and to defend us against

legal claims or disputes, including to:

- Protect our, your, or others' rights, privacy, safety, or property (including by making and defending legal claims).
- Audit our internal processes for compliance with legal and contractual requirements and internal policies.
- Enforce the terms and conditions that govern the Services.
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft.
- Follow applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

HOW INFORMATION IS PROCESSED

Your Data is processed by us under different circumstances and under a different lawful basis. The same is provided below for your information:

- To provide, administer, maintain and/or analyze the Services;
- To improve our Services and conduct research;
- To communicate with you; including to send you information about our Services and events;
- To develop new programs and services;
- To prevent fraud, criminal activity, or misuses of our Services, and to protect the security of our IT systems, architecture, and networks;
- To carry out business transfers; and
- To follow legal obligations and legal process and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or other third parties.

Aggregated or De-Identified Information. We may aggregate or anonymise Data so that it may no longer be used to identify you and use such information to analyze the effectiveness of our Services, to improve and add features to our Services, to conduct research and for other similar purposes. In addition, from time to time, we may analyze the general behavior and characteristics of users of our Services and share aggregated information like general user statistics with third parties, publish such aggregated information or make such aggregated information generally available. We may collect aggregated information through the Services, through cookies, and through other means described in this Privacy Policy. We will maintain and use anonymised information in anonymous or de-identified form and we will not attempt to anonymise the information, unless required by relevant law.

SHARING/TRANSFER OF DATA

We do not sell or share your Data with third-parties for interest-based advertising purposes. We may disclose your Data as described below:

Service providers- We may rely on third-party service providers in furtherance of the purposes described above. In these cases, Data may be accessed by these third-parties and processed on our behalf. These service providers can include hosting services, analytics services, cloud computing and storage services, maintenance services, security services, and user support services.

Affiliates- We may disclose Data to our affiliates, meaning an entity that controls, is controlled by, or is under common control with Krutrim. Our affiliates may use the Data we share in a manner consistent with this Privacy Policy.

Authorities and others- If we are legally obliged or otherwise believe it necessary to do so, Data may be disclosed to regulatory agencies, law enforcement agencies, courts, and other government authorities, including for the compliance and protection purposes described above.

International transfers

We may transfer your Data to recipients in countries outside your territory that may have differing data protection laws. This includes countries which may not have an adequate level of protection for Data. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. We will ensure there is a legal ground for the transfer in accordance with applicable data protection legislation. You will also be informed about the legal ground, what safeguards were implemented, and where you can obtain a copy of information on these safeguards. In case of sensitive personal data, we will specifically seek your consent before such transfers to other countries, and will also ensure that the conditions as required under law for such international transfer of sensitive data are complied with.

Children

Our services are not directed to, or intended for, children under 13. We do not ask for or collect Personal Data of Children under 13. If you have reason to believe that a child under 13 has provided Data to Krutrim through the Services, please email us at support@olakrutrim.com.

RETENTION

We will only retain your Data for as long as it is necessary to fulfill the purposes outlined in this policy or the purposes of which you have otherwise been informed. This means that when you have consented to our Processing of your Data, we will retain the data for as long as the active account lasts (and, where applicable, until the expiry of the warranty period) or until you withdraw your consent. If you have revoked your consent, we may nevertheless retain certain Data for the period required in order for us to meet our legal obligations and defend ourselves in legal disputes. If we have not received your consent for Processing, the Data will only be retained to the extent we are permitted to do so by law.

LODGING OF COMPLAINT

If you have any issues with the way we process data or you need any clarification on our privacy practices you can always contact our Data Protection Officer at dpo@olakrutrim.com. We will address your issues as soon as possible and within a maximum period of one month.

However, if you are still of the opinion that we are processing your personal data in violation of data protection laws and regulations you have the right to lodge a complaint with the supervisory authority.