

PRIVACY POLICY

Deeya Panel Products Private Limited (“**Ricron**” / “**we**” / “**us**” / “**our**”) respects the privacy of all the users who use (“**Users**” / “**you**” / “**your**”) its website www.ricron.com (“**Website**”). Ricron is committed towards protecting and safeguarding the personal information of its Users which may be collected by Ricron in consequence of your use / access / browsing of the Website. Any personal information collected from You on the Website shall be governed by this privacy policy (“**Privacy Policy**”). This Privacy Policy provides for the nature and type of personal information collected on the Website, the manner in which it is collected, use of such information, and disclosure and handling of such information by Ricron. The Users are advised to read this Privacy Policy, along with our Terms of Use (“**Terms**”), before using / accessing / browsing the Website and providing Ricron with their personal information.

By using the Website, you signify your consent for Ricron to manage your personal information in accordance with this Privacy Policy. If you do not agree with this Privacy Policy, then you shall not be authorized to use / access / browse the Website.

This Privacy Policy is published in compliance with, *inter alia*:

- (a) Section 43A of the Information Technology Act, 2000 (“**IT Act**”);
- (b) Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“**SPDI Rules**”); and
- (c) Rule 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011.

1. GENERAL

- 1.1 The collection and processing of information in the course of other contractual or commercial engagements that we may enter into with you, will be done in accordance with the specific terms applicable thereto, and not by this Privacy Policy.
- 1.2 By using / accessing / browsing or by otherwise giving us your information, you confirm that you have the capacity to enter into a legally binding contract and that you have read, understood and agreed to the practices and policies outlined in this Privacy Policy and our Terms of Use (together the “**Agreement**”). You hereby consent to our collection, use, sharing, and disclosure of your information as described in this Privacy Policy.

1.3 Change in Privacy Policy

Ricron is committed to comply with the extant applicable laws of India. Ricron reserves the right to amend, modify, add, delete or remove any portion of this Privacy Policy as required under any applicable law or if required to enhance and improve the Users’ experience of its Website. Usage of your personal information shall be governed by the last updated or revised Privacy Policy which shall be available on the Website. Your continued use / access / browsing of the Website after any such amendment or modification signifies your acceptance to such amendment or modification. If you do not agree with this Privacy Policy at any time, in part or as a whole, you may not use / access / browse the Website or provide us with any of your Information.

2. INFORMATION BEING COLLECTED

2.1 We collect the following types of information about you: (i) User Information; (ii) Locational Information; (iii) Cookies; (iv) Behavioural Information; and (v) Indirect Information, (each of which have been defined below, and collectively, “**Information**”). We may collect your Information either directly from you through offline documentation, by virtue of your use / access / browsing of the Website or indirectly by using different technologies.

The following information, may be collected by us:

- (a) Your: (i) full name, contact details, email address, mobile number and website; and (ii) details of the company / organization you work for, including your title / designation (“**User Information**”).
- (b) Information which refers to current geographical location details (“**Locational Information**”).
- (c) We also store cookies to: (i) track user activity, behaviour and movement on the Website; (ii) analyse user patterns and trends; (iii) track the sections, links, tabs or pages that are most visited by the users; and (iv) to build a database of user preferences (“**Cookies**”).
- (d) We may also collect information about how you use the Website and information about your mobile device and software including usage statistics, traffic data, your IP address, browser and operating system type, domain names, access times, locations, and details regarding the parts of the Website that you access (“**Behavioural Information**”).
- (e) your use of certain third party services on our Website, if any, also requires us to collect such information as is considered necessary for that purpose (“**Indirect Information**”).

2.2 While we may collect Locational Information, Behavioural Information and Indirect Information when you access or use our Website, we collect User Information only from you with your prior consent unless there are other legal grounds for doing so, as further specified in this Privacy Policy. If you provide us with User Information of third parties, we understand that You have obtained consent of such third parties, and have sufficient rights, approvals and licenses to provide such information to us.

3. CONSENT

3.1 The IT Act and the SPDI Rules regulate the collection, usage, retention and disclosure of personal information, which is defined under the SPDI Rules as any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available to a body corporate, is capable of identifying such person (“**Personal Information**”). Some of the Information collected by us may qualify as Personal Information.

- 3.2 By using / accessing / browsing the Website, you acknowledge and agree that all Personal Information provided by you to us is voluntarily which can be used in accordance with this Privacy Policy. The collection, use and disclosure of Personal Information requires your express consent, unless there are other legal grounds available to us to collect such information as further specified in this Privacy Policy. By using / accessing / browsing the Website or otherwise providing us with your Personal Information, where applicable, you are providing us with your unconditional consent to our collection, usage, disclosure, retention and processing of the Personal Information in accordance with the terms of this Privacy Policy.
- 3.3 In the event of a change in the law applicable to data protection in India, you hereby expressly consent to our continued use, storage, collection and disclosure of your Information including Personal Information to the fullest extent permitted under such applicable law. we may reach out to you for obtaining additional consents and approvals as required under the amended law and you will be required to comply with such requests. Should you choose to not provide us with such additional consents and approvals, we may have to discontinue your access to the Website.
- 3.4 You may choose to not provide us with or withdraw any or all information being Personal Information, but in the event that you do so, we may be unable to allow you to use / access / browse the Website or parts or features thereof, for which your Personal Information is being collected or processed. You can also withdraw your consent by writing to us at info@ricron.com.

4. USE OF PERSONAL INFORMATION

- 4.1 We may use your Information: (i) to operate and improve the Website in order to foster a positive user experience; (ii) for research purposes; (iii) to conduct audits and quality assessment procedures; and (iv) to analyse the use of our resources and troubleshooting problems in relation to the Website.
- 4.2 In addition to the above, we may also use your Information, including Personal Information: (i) for internal operational purposes such as record keeping, accounting and compliance with applicable laws; (ii) for recording information including dates, time and locations at which the Website has been accessed by using various tracking technologies and thereby improve our Website and your experience by providing you with relevant information based on the above. Your disabling of tracking features on the Website by changing settings on your smartphone, tablet or other device and / or web browser may result in your inability to use the Website optimally or entirely; (iii) to invite you for seminars, webinars and workshops conducted by us which we believe may be of interest to you; (iv) to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, or as otherwise required by law; (v) to respond to any queries that you may have, and to communicate information to you, including notifications of any alerts, any updates to the Website; and (vi) to contact you from time to time to record your valuable feedback on our Website, as it currently stands, and / or any potential services that may be offered in the future.
- 4.3 Further, we may use social media platforms such as LinkedIn, Instagram and YouTube. If you connect with us through any of these services, then such engagement will be subject to the terms

of service and privacy policy of the relevant social media platform and you should review the same before connecting with us on such social media platforms.

- 4.4 Our processing of your Personal Information in the context of your visit to and use of our Website are based on our legitimate interests to operate an internet website for general information and communication purposes, to optimize our Website, and to protect it from attacks. Furthermore, our processing of your Personal Information for providing regulatory updates or conducting other business development activities serves the legitimate interests of the users to receive training and know-how and serves our legitimate interests to develop our business and promote customer relationships.

5. **CHANGES TO YOUR INFORMATION**

- 5.1 You may review, correct, update, or change your Personal Information collected by us by sending an email to us at info@ricron.com.
- 5.2 If you wish to delete your Personal Information provided to Ricron, you can always do so by sending a request to us at info@ricron.com.
- 5.3 You may note that correction or deletion of certain information or data may lead to cancellation of your access to the Website or to certain features thereof. You also agree and acknowledge that certain data or information cannot be corrected or deleted and / or is prohibited from being deleted under any applicable law or in lieu of law enforcement requests or under any judicial proceedings.

6. **DISCLOSURE**

- 6.1 Ricron does not disclose any Personal Information to any individual or entity except as provided in this Privacy Policy. Ricron may disclose such Personal Information only when required under an applicable law to any authority authorized to collect such information and only to the extent necessary. Ricron may at its sole discretion, disclose the Personal Information of its Users to: (i) its employees, agents and service providers who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations; and (ii) third party organizations / entities who may analyse such Personal Information and other related data for the purpose of developing existing as well as new products, enhancing and improving our services, conducting research, marketing of products and services and other related purposes. Ricron does not sell or trade in any form or manner, the Personal Information of its Users to any third party.
- 6.2 In the event that Ricron discloses the Personal Information of its Users to any third party, it ensures that such third party is bound by confidentiality obligations similar to the confidentiality obligations of Ricron under this Privacy Policy, prior to such disclosure to such third party.

7. **SECURITY**

We are committed to ensure that your Personal Information is secure with us. To ensure the security and protection from any unauthorized access or disclosure we have in place appropriate

physical, electronic and technical procedures to safeguard and secure the Personal Information we collect on the Website. We do not retain any Personal Information collected from you for any period longer than reasonably required by us in accordance with applicable laws in India. However, please be informed that despite the stringent security measures being adopted by Ricron, there may still exist the risk of potential security breaches. Further, we shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond our reasonable control, including but not limited to, acts of government, hacking of devices, unauthorised access to computer data or other electronic devices and storage devices, device crashes, breach of security and encryption, etc.

8. **THIRD PARTY LINKS**

- 8.1 The Website may host links to third party websites and services (“**Third Party Links**”). We have no control over such Third Party Links, which are provided by persons or companies other than us. We are not responsible for any collection or disclosure of your Information or Personal Information by such companies or persons on such Third Party Links thereof.
- 8.2 You agree and acknowledge to that Third Party Links have their own privacy policies governing the collection, storage, transfer, retention and / or disclosure of your information and that you access such Third Party Links at your own risk.

9. **DISCLAIMER**

Although we are committed to protecting your privacy, we do not make any promise to the effect that your Information, including Personal Information, or private communications will always remain private or may be disclosed in ways not otherwise described in this Privacy Policy. You assume all responsibility and risk for: (i) your use of the Website; (ii) use of the internet generally; (iii) the information you provide or access; and (iv) your conduct on and off the Website. Further, we assume no liability for any actions of third parties with regard to your Information or Personal Information which you may have disclosed to such third parties by accessing or visiting Third Party Links. Ricron shall disclaim any liability arising out of your use of Third Party Links or any other dealings with such third parties.

10. **GOVERNING LAW**

This Privacy Policy shall, in all respects, be governed by and construed in all respect in accordance with the laws of India. The Parties agree to submit to the exclusive jurisdiction of the courts in Ankleshwar, Gujarat, India in connection with any dispute arising out of or in connection with these terms.

11. **GRIEVANCE REDRESSAL**

If you have questions, comments, suggestions or grievance with respect to the Privacy Policy, please send us an e-mail at info@ricron.com.