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Privacy Statement

Aparajitha (i.e. the Aparajitha Group inclusive of all the various legal entities or related companies) respects the need for Privacy (individual and organizational), providing services and developing technology that gives the most powerful and safe experience.

This Privacy Statement applies to the entire Aparajitha Group comprising of various legal entities, and governs data collection, storage and usage in accordance with the prevailing laws of the country.

COVERAGE/SCOPE:

This policy refers to all the internal and external stakeholders (employees, clients/customers, suppliers.) who provide information to **Aparajitha** and to whom **Aparajitha** provide information to carry out agreed upon business operations. Employees of all the companies belonging to **Aparajitha Group** must follow this policy. Contractors, consultants, partners and any other external entities are also covered. Generally, the policy refers to anyone the company collaborates with for any business reason.

INFORMATION COLLECTION, STORAGE AND USAGE:

Aparajitha requires different types of information (sensitive and non-sensitive of individuals and the organizations) that are needed for:

- (i) Statutory Compliance
- (ii) Organization's internal operations and functions
- (iii) Stated functions / purpose towards delivery of services/products.
- (iv) Illustrative list of information: Name (individual and organizational), email IDs, contact details, anonymous geographic / demographic information (which are not unique like postal code), other system related information like IP address, access times.

All the information used in and by **Aparajitha** will be used towards running of its businesses; to deliver services/products and won't be shared with any third party.

Aparajitha may also contact its existing clients and or prospective clients via surveys to conduct research about **Aparajitha's** services/products and or of potential new services/products that may be offered.

Aparajitha does not sell, rent or lease its customers' lists to third parties.

Aparajitha does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent.

The information provided to **Aparajitha** will be stored primarily in India, with the exception of countries wherein the law may stipulate storage of data of such entities operating in that country to be stored in the same country or continent, **Aparajitha** shall do so in discussion with such stakeholders as required.

Aparajitha will implement appropriate and applicable controls to a reasonable extent to secure and protect the information

DISCLOSURE

Statutory:

Aparajitha may disclose personal information, only if required to do so by law or in the good faith that such action is necessary to:

- (a) Conform to the edicts of the law or comply with legal process served on **Aparajitha**
- (b) Protect and defend the rights or property of **Aparajitha**
- (c) Act under exigent circumstances to protect the personal safety of users of **Aparajitha** or the public.

Disclosure to Third Parties:

Aparajitha does not outsource their core business services to any third party.

Aparajitha may engage qualified vendors for any of the activities that may be incidental but important to the business such as Security services, internal audit etc.

Aparajitha may disclose personal data to such third parties as a part of normal scope of services agreed upon with the vendor. The disclosure to any third party will be undertaken only upon entering into a legally enforceable contract. The contract shall contain appropriate privacy clauses. Third parties are mandated to handle all personal data in accordance with the following:

- I. Third parties must ensure equal care and adequate levels of protection; and
- II. Appropriate security measures must be implemented to safeguard the personal data; and
- III. The personal data must only be processed in accordance with Aparajitha's instructions. Third parties shall not further disclose any information shared with them to any other stakeholder without the written consent of Aparajitha.
- IV. In the event of any breach of agreement on disclosure of any information shared by Aparajitha, the vendor shall be terminated and black listed.

Aparajitha conducts appropriate due diligence checks prior to and during the selection of third parties, and during engagement of their services, as applicable.

COMMUNICATION & PUBLICATION

Aparajitha's privacy policy will be suitably and appropriately communicated to all concerned parties (including but not limited to employees, vendors) and will be published in the website.

DISCIPLINARY MEASURES

All aspects of privacy policy and controls must be followed both in letter and spirit. Any breach will be seriously viewed and will invoke disciplinary and possible legal action. **Aparajitha** follows its own internal Disciplinary rules and code of Conduct. If any employee is found violating them, he/she shall be liable for disciplinary action as applicable.

MISCELLANEOUS:

- 1) **Aparajitha** reserves its full rights to modify or revise or add or delete any clause(s)/provision(s) of this Privacy Statement without prior notice. If any provision is held invalid, the offending clause will be modified so as to be enforceable and, as modified, shall be fully enforced, and the remainder of the Privacy statement will continue in full force and effect.
- 2) Nothing in this Privacy Policy restricts, excludes or modifies or purports to restrict, exclude or modify any statutory rights under any applicable law.

- 3) Anyone who becomes aware of any breach of security shall immediately notify Aparajitha through the established agreed upon processes in case of being a stakeholder directly involved in the course of business operations, else can notify through the email id: info@aparajitha.com. The use of the **Aparajitha** website(s) or services or products indicates the acceptance of the Privacy Statement.
- 4) In the event of a conflict between this Privacy Policy and the terms of any agreement(s) with **Aparajitha** the terms of those agreement(s) will take precedence.