

# Privacy Policy

## INTRODUCTION

This privacy policy (together with the documents referred to in it) (the "Privacy Policy") informs you about how we use your personal data collected through our website and mobile applications (the "Platform").

The Platform is operated by Aptprod Development Private Limited having office at 303, Neelkamal, Sane Guruji Marg, Shivaji Nagar, Thane (West), Maharashtra, India - 400602 with CIN U74999MH2016PTC286755 Our GST number is 27AAOCA8755H1Z4.

This Privacy Policy explains our information collection practices on the Platform, such as the types of information we collect regarding visitors to the Platform and the ways in which we may use that information. This Privacy Policy applies to any visitors that use the Platform (you, your, Users). This Privacy Policy also applies to your use of interactive features or downloads that: (i) we own or control; (ii) are available through the Platform; or (iii) interact with the Platform (including through social media) and post this Privacy Policy. In addition, please review the [Cookie Policy](#) and [Terms of Use](#), which govern your use of the Platform.

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## GENERAL TERMS

### 1. What information does the Platform collect?

We may collect and process the following data from and about you:

- information collected as part of any registration or interaction with the Platform, through information collection forms. This includes information included within comments that you post on the Platform. The typical information that we collect includes your display name (which may be a pseudonym or your name), title, name, gender, date of birth, address, e-mail address, password, phone number, preferred language, preferences or other relevant contact details;

- demographic information, such as information about your industry sector, that is not identifiable to you personally. We may collect this information through various forms and in various places on the Platform;
- information collected as part of your visits to the Platform;
- details of your use of products or services used in connection with the Platform;
- details of any e-mail correspondence or any other social media interactions that you have with us; and
- cookie or other tracking information collected.

## 2. What is our cookie policy?

2.1. Please [click here](#) for further information on our [Cookie Policy](#).

## 3. How do we use the information collected?

3.1. We may use your information that we collect about you:

- (a) to improve the Platform, our products or services, to customize your experience on the Platform, or to serve you specific content that is most relevant to you;
- (b) to contact you with regard to your use of the Platform and, in our discretion, changes to the Platform and/or Platform's policies;
- (c) for internal business purposes;
- (d) for purposes disclosed at the time you provide your information or as otherwise set forth in this Privacy Policy;
- (e) to provide you with information, products or services or process transactions that you have requested or agreed to receive including sending to you electronic newsletters, or providing you with marketing materials;
- (f) to enable you to participate in a variety of the Platform's features;
- (g) to process your registration with the Platform, including verifying your information is active and valid;
- (h) to identify you as the author of any comments that you send to us to be posted on the Platform;
- (i) to ensure that content on the Platform is presented in the most effective manner for you and for your computer or mobile device;
- (j) to provide you with information relating to any events held by us, where you have consented to be contacted for such purposes; and
- (k) to provide you with access to your personal account.

3.2. To make the Platform more interesting and useful to you, the information that we collect from you when you use the Platform or request further products or services may be used for our own advertising and market research purposes.

3.3. We may share non-personally identifiable information, such as aggregated user statistics, with third parties, including through third party applications. Please refer to section 8 below for further information for third party information collection techniques.

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#### **4. Do we use your information for marketing purposes?**

4.1. To the extent permitted by law, we may use your data to contact you by electronic means (e-mail) with information about products, events and services which may be of interest to you. We will provide you with an opportunity to opt-out from this should you not wish to receive such information.

4.2. We may permit selected third parties to use your data to contact you by e-mail with information about products, events and services which may be of interest to you, provided that you have provided us with your consent to do this. If you do not want us or third parties to use your data in this way, please notify us of your wishes by e-mail or on the form on which we collect your data.

4.3. We may also contact you by phone or standard mail, depending upon your preferences.

#### **5. How and when do we disclose information to third parties?**

5.1. We may share the information we have collected about you, including personal data, as follows:

(a) we may employ the services of a third party to help us in certain areas, such as in relation to e-mail marketing, call centres or website hosting. In some cases, the third party may receive your information;

(b) we may share the information with our parent, subsidiaries and affiliates for internal reasons. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Platform or applicable database; or (ii) in connection with a merger, consolidation, restructuring, the sale of substantially all of our interests and/or assets or other organisational change, including, during the course of any due diligence process; and

(c) we may disclose your information to the fullest extent permitted by applicable law: (i) to satisfy any applicable law, regulation, subpoenas, governmental requests or legal process if in our good faith opinion such is required or permitted by law; (ii) to protect and/or defend our Terms of Use or other policies applicable to the Platform, including investigation of potential violations thereof; (iii) to protect the safety, rights, property or security of the Platform or any third party; and/or (iv) to detect, prevent or otherwise address fraud, security or technical issues. Further, to the fullest extent permitted by applicable law, we may use IP addresses to identify users, and may do so in cooperation with third parties such as copyright owners, internet service providers, wireless service providers and/or law enforcement agencies, including disclosing such information to third parties, all in our discretion. Such disclosures may be carried out without notice to you, to the fullest extent permitted by applicable law.

#### **6. What about my own user generated content?**

The Platform may permit you to submit ideas, writings, data, questions, comments, suggestions or other content, including Personal Information (collectively, "User Content"). BE AWARE THAT SUCH PUBLIC POSTINGS ARE NOT CONFIDENTIAL. We or others may reproduce, publish, distribute or otherwise use User Content online or offline in any media or format (currently existing or hereafter developed). Others may have access to this User Content and may have the ability to share it with third parties across the Internet. Please

think carefully before deciding what information you share, including personal data, in connection with your User Content. Please note that we do not control who will have access to the information that you choose to make public and cannot ensure that parties who have access to such publicly available information will respect your privacy or keep it secure. Our obligations under this Privacy Policy do not apply to any information that you disclose publicly, share with others or otherwise upload onto the Platform. We are not responsible for the accuracy, use or misuse of any content or information that you disclose or receive from third parties, through the Platform.

#### **7. How do I change my information and communications preferences?**

7.1. Upon request, we will remove your personal information from our Platform and/or our database. Users are also advised that upon written request you may access and/or request that any erroneous information about you be corrected.

7.2. You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of registration.

7.3. You may cancel or modify your communications that you have elected to receive from the Platform by following the unsubscribe instructions contained within an applicable e-mail.

#### **8. What about third party information collection techniques?**

This Privacy Policy does not apply to applications, technologies or sites that are owned by and/or operated by other parties (such as app developers, third party advertisers or third-party ad servers), even if they use our technology to collect or store information. This includes third parties that embed our technology in their apps or ads to facilitate download tracking or ad serving. We do however work with third parties to ensure that you are provided with the necessary information and are provided with the opportunity to make your choice. The relevant third party's terms of use, privacy policy, permissions, notices and choices should be reviewed regarding their collection, storage and sharing practices.

#### **9. What about security, storage and international transfer?**

9.1. The Platform and the information is stored on a host server located in the United States.

9.2. We incorporate commercially reasonable safeguards to help protect and secure your personal data. However, no data transmission over the Internet, wireless transmission or electronic storage of information can be guaranteed.

9.3. When you sign up to the Platform, you may also be asked to choose a password. You are entirely responsible for maintaining the confidentiality of your password. You agree not to use the account, username, email address or password of another user at any time or to disclose your password to any third party. You agree to notify us immediately if you suspect any unauthorised use of your account or access to your password.

9.4. Please be aware that information we collect, including your personal data, may be transferred to, processed and stored outside of the EEA. The data protection laws in such jurisdictions may differ from those of the country in which you are located, and your personal data may be subject to access requests from governments, courts, or law enforcement in those jurisdictions. We take commercially reasonable steps to ensure that

your data is treated securely, including entering into appropriate data transfer agreements. We may also share personal data as set forth below:

1. by transfer to other Intertek Group companies where it is necessary to meet the purpose for which you have submitted the information; and
2. by transfer to third party agents and subcontractors which perform certain functions on our behalf, such as picking up and delivering samples, fulfilling inspection orders, sending email, removing repetitive information from client lists, analysing data and processing credit card payments. These parties only have access to such information as necessary to perform their functions and may not use it for any other purpose.

#### **10. How long we keep your data?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available on request. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your information, the purposes for which we process your information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

#### **11. What about changes to the Privacy Policy?**

We reserve the right to modify or add to this Privacy Policy at any time without prior notice ("Updated Privacy Policy"). You agree that we may notify you of the Updated Privacy Policy by posting it on the Platform so that it is accessible via a link on the homepage of the Platform, and that your use of the Platform after we have posted the Updated Privacy Policy (or engaging in such other conduct as we may reasonably specify) constitutes your agreement to the Updated Privacy Policy. Therefore, you should review this Privacy Policy before using the Platform. The Updated Privacy Policy will be effective as of the time of posting, or such later date as may be specified in the Updated Privacy Policy and will apply to your use of the Platform from that point forward.

#### **12. What are your rights?**

Regarding the information held about you by us, you may:

- request us to provide you with a list and a description of this information;
- request us to amend any inaccuracies;
- request us to delete your information by contacting us in the manner set out below;
- object to the processing of your information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have

the right to object where we are processing your personal information for direct marketing purposes;

- Request us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [admin@aptprod.com](mailto:admin@aptprod.com)

If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated.

**13. How can you contact us if you would like to make a complaint?**

If you would like to contact us for any further information or to make a complaint, please send an email to [admin@aptprod.com](mailto:admin@aptprod.com)