

Privacy Policy

Introduction

Kladana Private Limited (referred to as the «**Company**» or «**We**» or «**Kladana**») recognizes the importance of protecting the privacy of its Customers, Partners, Employees or anyone who interacts with us (collectively referred to as «**User**» or «**You**» or «**Your**»). We aim to protect the Data (at-rest, in-use, and in-motion) to ensure the safety of the business interest and reputation without causing any disruption in their day-to-day business activities.

This Privacy Policy is published in accordance with the relevant laws, regulations, and standards in your local area, as well as common practices in other countries and regions.

The following are our guiding principles regarding privacy:

- Ask for only the least amount of necessary information, gathering only what we believe is essential for doing business or the specific transaction.
- Effective, efficient and sustainable processes for sharing data with employees, partners, and directors.
- Strict approval and authorisation mechanism to access the information collected.
- Higher control, visibility and strong technologies in our tools and applications with respect to the usage and protection of information.
- The specific purpose for all information collected.

This privacy policy («**Privacy Policy**») explains how we collect, use, share and protect personal information about the users of the Platforms («you» or «User»). We have created this Privacy Policy to demonstrate our commitment to the protection of your privacy and your personal/ corporate information. Your use of and access to the Platforms is subject to this Privacy Policy and the terms and Conditions of our User Agreement. Any capitalized term used but not defined in this Privacy Policy shall have the meaning attributed to it in the Terms and Conditions of the User Agreement. The policy covers the following aspects:

- Definitions
- Collection of Data.
- Use of collected information
- Disclosing Collected Information
- Security of data collected
- Your rights and choices
- General information
- Changes to the privacy policy
- Grievance redressal

By accessing the Company website or otherwise using the Services, you consent to collection, storage, use, disclosure or otherwise processing of the data you provide (including your sensitive personal information) per this Privacy Policy for any of the services Kladana offers. Before sharing any information representing any third party or any other person/people, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

Definitions

1. «Customer», «User», «You», «Your» means any individual or legal entity acquiring Usage Rights in the Kladana Services and/ or whose data is being collected by any other means.

2. «Website(s)» means

- the website that Kladana owns and operates, such as <https://www.kladana.com/>
- software that Kladana owns and operates, such as <https://app.kladana.com/>
- any web pages or social networks that post a link to this privacy policy

3. «Kladana», «We», «Us» means Kladana Private Limited, a company incorporated under the Companies Act 2013 of India.

4. «Personal Data», «Data» refers to all the personal, non-anonymized data provided by the Customer, You, User, or any other person.

5. «Sensitive Personal Data» means such personal information, which consists of information relating to passwords, financial information, sexual orientation, and biometric information as defined in the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011.

Data Collection

1. When you use our Platform, we occasionally collect and store the information you provide. In general, you may browse the Platform without telling us who you are or revealing personal information about yourself. Once you give us your personal information, you are not anonymous to us. You always have the option to not provide information by choosing not to use a particular service provided by us.

2. Kladana may collect, store and use the following kinds of Personal/ corporate Information such as email address, name, phone number, mobile number during:

- Online and offline data submission by filling out forms online and providing your name, mobile number, and email ID or providing your contact information by contacting us through phone, SMS, chat or mail
- Events, trade shows or other marketing activities, the personal information that you provide
- Sharing of billing information such as name, email id, mobile number and other information with Kladana
- At the time of service usage and activating subscription, sharing of User ID etc.
- When you send us personal correspondence, such as emails or letters

Use of collected information

Information that is freely available in the public domain or accessible under the Right to Information Act, 2005 or any other law will not be regarded as personal/ corporate information or sensitive personal data or information. You understand that Kladana may use certain information of yours, which has been designated as 'sensitive personal data or information' under the SPI Rules: (a) to provide you with the Services, (b) for commercial purposes and in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes, (c) for sale or transfer of such research, statistical or intelligence data in an aggregated or non-personally identifiable form to our advertisement, strategic and marketing partners. Kladana also reserves the right to use the information provided by or about the User for the following purposes:

- Publishing such information on the Platforms;
- Contacting the User to offer new services;

- Contacting the User for taking feedback or to provide support;
- Sending marketing communications, including emails or WhatsApp messages, about our products, promotions, blog updates, invitations to events hosted by us or our partners and other news.
- Analyzing software usage patterns for improving product design and utility; and
- Analyzing anonymized information for commercial use.
- Provide any information and services that you have requested or any applications or services that you have ordered;
- Provide, maintain, protect, and improve any applications, products, services, and information that you have requested from us;
- Manage and administer your use of applications, products, and services you have asked us to provide;
- Provide you with any information that we are required to send you to comply with our regulatory or legal obligations;
- Detect, prevent, investigate, or remediate crime, illegal, or prohibited activities or otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes);

However, Kladana will not at any time, without your explicit consent, supply your personal sensitive data to any third party for the purpose of their or any other third party's direct marketing purposes.

If you wish to cancel your account or request that we no longer use your information to provide you the Services, contact us through **support@kladana.com**. We will retain your information for as long as your account on the Platforms is active and as needed to provide you with the Services. We shall not retain such information for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force. After a period of time, your data may be anonymized and aggregated and then may be held by us as long as necessary for us to provide our Services effectively or improve the Services, but our use of the anonymized data will be solely for analytic purposes.

Disclosing Collected Information

Kladana may share your information with the following:

1. Regulators to meet our legal and regulatory obligations and to respond to the court orders or other legal processes; and
2. Law enforcement agencies so that they may detect or prevent crime or prosecute offenders

We may publicly share non-personally identifiable information about using our website, products and/or services with third parties. Under no circumstances, Kladana will publish or share any information with any third party for any purpose other than the stated ones without your express consent.

An access to your information might be granted to Kladana employees if necessary and only if a non-disclosure agreement has been concluded with such employees.

Security of Data

1. Kladana will take required technical and organizational precautions to prevent the shared information's loss, misuse or manipulation. Once your information is in our possession, we adhere to our security guidelines to protect it against unauthorized access.
2. Kladana will store all the information so collected, on secure password protected servers.
3. You acknowledge the fact that data transmitted through internet may be naturally prone to insecurity and Kladana cannot guarantee with regard to it.
4. We use encryption technology to ensure the confidentiality of data.
5. We deploy access control mechanisms to ensure that only authorized personnel have access to personal data.
6. We will use secure encryption technology to protect your personal data during transmission. We will take all appropriate organizational, management, and technical measures to protect the security of the personal data.

Your Rights and Choices

- **Right to Confirmation and Access:** Right to know what personal data is stored by Kladana, how personal data is being used by Kladana
- **Right to Correction and Updation:** Right to access, update or correct Data residing with Kladana
- **Right to Data Portability:** Right to receive your personal data in a structured, commonly used and machine-readable format. Also, the right to transmit this data to another vendor/company of your choice without hindrance from Kladana
- **Right to Be Forgotten or Deletion:** Right to erasure or restrict or prevent continuing disclosure of Data to Kladana
- **Right to the withdrawal of consent:** Kladana will allow you to exit or withdraw consent from processing your data further. However, that withdrawal of consent will not be retroactive and will be in accordance with the terms of this Privacy Policy, related Terms of Use and applicable laws

If our physical, technical, or managerial safeguards are breached, leading to unauthorized access, public disclosure, alteration, or destruction of your data and causing damage to your legal rights, we will be held liable as required by law. In the event of a personal data security incident, we will promptly notify you in compliance with applicable laws and regulations. This notification will include: a summary of the incident, its potential impact, the measures we have taken or plan to take to address it, recommendations for actions you can take to mitigate risks, and any available remedies. We will communicate this information to you via email or SMS.

You can write to us at support@kladana.com to assist you with these requests.

General Information

1. Cookies

Our Sites use cookies and other technologies to function effectively. These technologies record Data about your use of our Sites, including: Browser and device data, such as IP address, device type, operating system and internet browser type, screen resolution, operating system name and version, device manufacturer and model, and language/version of the Websites you are visiting; Usage data, such as time spent on the Websites, pages visited, links clicked, language preferences, and the pages that led or referred you to our Websites.

2. Consent

All collected data is subject to your consent for the collection, use, storage, disclosure and otherwise processing of your information (including sensitive personal information) in accordance with this Privacy Policy. If you disclose to us any personal/ corporate information relating to other people/ corporate, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy. You can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing Kladana conducted prior to your withdrawal, nor will it affect processing of your Data conducted in reliance on lawful processing grounds other than consent. However, in the event you withdraw consent given to us under this Privacy Policy, such withdrawal may hamper your access to the Platform or restrict provision of our services to you for which we consider that information to be necessary.

3. Retention of Data

We retain your personal information in accordance with applicable laws, for a period no longer than is required for the purpose for which it was collected or as required under any applicable law. However, we may retain data related to you if we believe it may be necessary to prevent fraud or future abuse, to enable us to exercise its legal rights and/or defend against legal claims or if required by law or for other legitimate purposes. We may continue to retain your data in anonymised form for analytical and research purposes.

4. Availability of our platform

Use of our Platform is available only to persons who can form a legally binding contract under the Indian Contract Act, 1872. We do not knowingly solicit or collect personal information from children under the age of 18 years. If you have shared any personal information of children under the age of 18 years, you represent that you have the authority to do so and permit us to use the information in accordance with this Privacy Policy.

Changes to this privacy policy

Please check our Privacy Policy periodically for changes. We may update this Privacy Policy to reflect changes to our information practices. We will alert you to significant changes by posting the date our policy got last updated or placing a notice on our Platform, or by sending you an email when we are required to do so under the applicable law.

Grievance Redressal

To exercise any of the rights or to share any grievance or queries, please write us an email to our Grievance Redressal Officer.

In accordance with the applicable provisions of the Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Redressal Officer are provided below:

Email: support@kladana.com

contact@kladana.com

marketing@kladana.com

2024, Kladana Pvt. Ltd. CIN U72900MH2022FTC395486

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