

## Privacy Policy

### Document History

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## Privacy policy

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website OR By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.4 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.
- 1.5 In this policy, "we", "us" and "our" refer to Infraon Corp. or any of its affiliates or subsidiaries [For more information about us, see Section 14.]

### 2. Definitions

**"Controller"** means the natural or legal person, public authority, agency, or other body which alone or jointly with others, determines the purposes and means of the processing of Personal Data.

**"End-User"** means any person or entity with whom the Subscriber interacts using the Service(s).

**"Personal Data"** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**"Process"** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**"Processor"** means a natural or legal person, public authority, agency, or other body which Processes Personal Data on behalf of the Controller.

**"Service(s)"** shall have the meaning ascribed to it in the Terms of Use.

**"Subscriber"** means the natural or legal person that has subscribed to the Service(s) by agreeing to the Terms of Use.

**"Terms of Use"** means the binding contract between Us and You which governs the access and use of the Service(s) by You available at [https://infraon.io/assets/docs/Terms%20of%20Use%20-%20Infraon%20Corp\\_Final.pdf](https://infraon.io/assets/docs/Terms%20of%20Use%20-%20Infraon%20Corp_Final.pdf)

**"Website(s)"** means the websites that We operate.

**"You"** and **"Your"** means an identified or identifiable natural person whose Personal Data We process as

Controller.

### **3. Personal Data Collected By Us**

3.1 You directly provide Us with most of the data We collect. We collect Personal Data from You directly as follows:

- (a) When You subscribe for any of Our Service(s) by agreeing to the Terms of Use, We collect sign-up and account information including Your name and e-mail address;
- (b) When You create a personal profile on Our website, We collect profile data which may include Your name, email address, Your organization's name and business contact number;
- (c) When you purchase goods or services from Us and/or through our Website, We may process information relating to the transaction which may include Your contact details;
- (d) When You submit web forms on Our Website(s) or as You use interactive features of the Website(s), including providing feedback or suggestions, making requests, information that you post for publication, or participation in surveys, contests, webinars, events, podcasts, promotions, sweepstakes, requesting customer support, submitting enquiries or otherwise communicating with Us;
- (e) When You provide testimonials, forms or information to Us in other contexts; or
- (f) For single sign-on, when You authorize Us to connect with a third-party service, We will access and store Your Personal Data that the third-party service makes available to Us, which may include Your email address, location or profile information;

3.2 We may also receive Your Personal Data indirectly as follows:

- (a) from third party sources like marketing lists, databases and social media but only where We have checked that these third parties either have Your consent or are otherwise legally permitted or required to disclose Your Personal Data to Us;
- (b) When You download and/or use the Service(s), We automatically collect information on the type of device You use, and the operating system version, to perform Our agreement with You;
- (c) When You use or view Our Website(s), information is collected via Your browser's cookies as described in Section 11 herein;
- (d) We may also collect or receive Your Personal Data from other sources such as Our business or channel partners through whom You create or access Your Account, publicly available sources, email add-ons and/ or through the combining of information We obtain from third parties along with the Personal Data You provide to Us.

- 3.3 The Website(s) includes social media features and widgets that are either hosted by a third-party or hosted directly on the Website(s) and Your interaction with these social media features and widgets is governed by the privacy statement of the companies that provide them. You should check Your privacy settings on these third-party services to understand and change the information sent to Us through these services.

#### **4. Purposes for Which Personal Data Will be Processed**

##### 4.1 We Process Your Personal Data to:

- (a) facilitate Your access to the Website(s) and Service(s);
- (b) process and complete payment transactions;
- (c) provide customer service and support;
- (d) send You communication on Your use of the Service(s), updates on Our Terms of Use or other policies;
- (e) send You communication on new features in the Service(s) or new service offerings;
- (f) conduct research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve Our Service(s) and facilities in order to enhance Your relationship with Us or for Your benefit, or to improve any of Our Service(s) for Your benefit;
- (g) Organise events or for other marketing/ promotional activities;
- (h) investigate and prevent fraudulent transactions, unauthorized access to the Websites and Service(s), and other illegal activities;
- (i) personalize the Websites and Service(s); and for other purposes for which We obtain Your consent.
- (j) for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice

4.2 In addition to the specific purposes for which we may process Your Personal Data set out in this Section 4, we may also process Your Personal Data where such processing is necessary for compliance with a legal obligation to which We are subject, or in order to protect Your vital interests or the vital interests of another natural person.

4.3 Please do not supply any other person's Personal Data to Us, unless We prompt You to do so.

## **5. Providing your personal data to others**

5.1 We may disclose Your Personal Data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) in so far as reasonably necessary for the purposes set out in this policy.

5.2 We may disclose Your Personal Data] to Our professional advisers in so far as reasonably necessary for the purposes of [obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5.3 We may disclose Your Personal Data to Our suppliers or subcontractors in so far as reasonably necessary for the purposes.

5.4 We may disclose Personal Data to Our third-party service providers that host and maintain the Our Website(s), applications, backup, storage, payment processing, analytics and other services. These third-party service providers may have access to or Process Your Personal Data for the purpose of providing these services to Us.

5.5 We may disclose Your Personal Data to third-party providers who assist Us in marketing and promotions in compliance with applicable laws.

5.6 We may share Personal Data relating to financial transactions with Our payment services providers only to the extent necessary for the purposes of processing Your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds].

5.7 When We Process Your order where You are a Subscriber, we may send Your Personal Data to and also use the resulting information from credit reference agencies to prevent fraudulent purchases.

5.8 In addition to the specific disclosures of Personal Data set out in this Section 5, we may disclose your Personal Data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect Your vital interests or the vital interests of another natural person. We may also disclose Your Personal Data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5.9 We may also share Personal Data to assist investigation and prevention of illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Our Terms of Use, or as otherwise required by law.

## **6. International transfers of your personal data**

6.1 In this Section 6, we provide information about the circumstances in which Your Personal Data may be transferred to countries outside the European Economic Area (EEA), the United Kingdom and/or Switzerland.

6.2 We mainly Process Personal Data in India and the United States of America. However, we may transfer Personal Data outside India and the United States of America for the purposes referred to in Section 4. We will ensure that such transfers are protected by appropriate safeguards, namely by the use of standard data protection clauses adopted or approved by the European Commission, and the recipient of Your Personal Data offers an adequate level of protection that is at least comparable to that which is provided under applicable data protection laws.

## **7. Retaining and deleting personal data**

7.1 This Section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

7.3 In the absence of a need to retain Personal Data under Section 7.2. above, We will either delete it or aggregate it, or, if this is not possible then We will securely store Your Personal Data and isolate it from any further Processing until deletion is possible.

7.4 We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 8. Security of Personal Data

We use appropriate technical and organizational measures to protect the Personal Data that We collect and Process. The measures We use are designed to provide a level of security appropriate to the risk of Processing Your Personal Data. If You have questions about the security of Your Personal Data, please contact Us immediately as described in this Policy.

## 9. Amendments

9.1 We may update this policy from time to time by publishing a new version.

9.2 We may notify you of changes to this policy by email or through the private messaging system.

## 10. Your rights

In this Section 10, we have summarised the rights that you have under data protection law. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

10.1 Your principal rights under data protection law are:

- (a) the right to access- You can request us to confirm whether We Process Your Personal Data and where We do, You can request access to the Personal Data. Provided the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. We may withhold personal information that you request to the extent permitted by law.
- (b) the right to rectification- You can request Us to have any inaccurate Personal Data about You rectified and, taking into account the purposes of the processing, to have any incomplete Personal Data about You completed.
- (c) the right to erasure- You can request the erasure of Your Personal Data without undue delay in some circumstances.
- (d) the right to restrict processing- You can request Us to restrict the Processing of Your Personal Data
- (e) the right to object to processing- You can object to the Processing of Your Personal Data
- (f) the right to data portability- You can request the portability of Your Personal Data
- (g) the right to opt-out of marketing communications - You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails We send You. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact Us.
- (h) the right to complain to a supervisory authority- If You consider that Our Processing of Your Personal Data infringes applicable data protection laws, You have a legal right to lodge a complaint with the concerned supervisory authority responsible for data protection. For more information, please contact Your local data protection authority; and
- (i) the right to withdraw consent- To the extent that We Process Your Personal Data on the basis of Your consent,

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You have the right to withdraw that consent at any time.

10.2 You may exercise any of your rights in relation to Your Personal Data by contacting Us at the details provided in Section 14 and supplying appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address). We respond to all requests We receive from individuals wishing to exercise their data protection rights within a reasonable timeframe in accordance with applicable data protection laws.

## 11. Cookie Policy

11.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

### 11.2 Cookies that we use

We use cookies for the following purposes:

- (a) **Essential Cookies:** We set essential cookies that enable core functionality such as security, network management, and accessibility. You may not opt-out of these cookies. However, You may disable these by changing Your browser settings, but this may affect how the Website(s) functions.
- (b) **Analytics, Customisation and Advertising Cookies:** We set these cookies to help Us improve Our Website(s) by collecting and reporting information on how You use it. The cookies collect information in a way that does not directly identify anyone.

11.3 When You visit the Website(s), a cookie banner will be displayed providing additional information about cookies and options to opt out of non-essential cookies as required by applicable laws.

### 11.4 Managing Cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up- to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

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- 11.5 Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

## 12. Privacy of Children

We recognize the importance of children's safety and privacy. We do not request, or knowingly collect, any Personal Data from children under the age of 18. If a parent or guardian becomes aware that his or her child has provided Us with Personal Data, they should write to us at the email address provided in Section 14.

## 13. Notice to End-User and other exclusions

- 13.1 Our Service(s) are intended for use by enterprises. Where the Services are made available to an End-User through a Subscriber, that enterprise is the Controller of the End-User's Personal Data. In such a case, the End-User's data privacy questions and requests should be submitted to the Subscriber in its capacity as the End-User's Controller. If the End-User is an individual who interacts with a Subscriber using Our Services, the End-User will be directed to contact Our Subscriber for assistance with any requests or questions relating to their Personal Data. We are not responsible for Subscribers' privacy or security practices which may be different from this notice. Subscribers to Our Services are solely responsible for establishing policies for and ensuring compliance with all applicable laws and regulations, as well as any and all privacy policies, agreements, or other obligations, relating to the collection of Personal Data in connection with the use of Our Services by End-Users.
- 13.2 Our Website(s) contain links to other websites. Our Policy applies only to our Website(s), so if You click on a link to another website, You should read their privacy policy. We encourage You to review the privacy statements of any such other websites to understand their Personal Data practices.
- 13.3 This Policy does not apply to aggregated information which summarises statistical information about groups of members, and which does not include name, contact information, or any other information that would allow any particular individual to be identified.

## 14. Contact Information

You may contact us if You have any enquiries or feedback on Our personal data protection policies and procedures, or if You wish to make any request, in the following manner:

Data Protection Officer: Pushpa

Email Address: [privacy@infron.io](mailto:privacy@infron.io)

Address: No.759, Sree Gururaya Mansion, South Wing, 8th Main, J P Nagar III Phase, Bengaluru KA 560 078

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