

PRIVACY POLICY

1. Introduction

Startup Buddy Services Private Limited, a Company Incorporated pursuant to the laws of India, having its Registered Office at 3011, LGF, Sector-46, Gurugram-122002 (hereinafter referred to as “Startup Buddy”, “we”, “our” or “us”) engaged inter-alia in the business of providing one-stop shop solutions to startups and other business entities (hereinafter referred to as “Users”, “You”) with services beginning with Incorporation, Accounting, Taxation, Secretarial Compliance, MIS, IPR, Legal Assistance, Project Advisory and other services in India and overseas (collectively referred to as the “Services”).

At Startup Buddy your privacy is of great importance to us. We understand that you entrust us with certain Personal Information (as defined below) to help us provide various Services. In exchange for your trust, you expect and deserve our commitment to treat your information with respect and in accordance with the terms of this privacy policy ("Privacy Policy"). Startup Buddy values your privacy. In this Privacy Policy ("Policy"), we describe the information that we collect about you when you visit our website, <http://www.startupbuddy.co.in> (the "Website"); use all other technology platforms built by Startup Buddy (the “Platform” and use the Services available on the Website. This privacy policy (the “Privacy Policy”) is designed to tell our users (“User/you”) about our best practices regarding collection, use, and disclosure of information that you may provide for using our Services/accessing the Startup Buddy Website/Platform. By using/ accessing the Services and the Startup Buddy Website/Platform and by providing any information to us through the Website/Platform, you agree to the terms of this Privacy Policy.

2. General

This Privacy Policy covers treatment of personal information that Startup Buddy Services Private Limited collects and receives, including information related to your past use of the Website. "Data" and "information" includes information about you that is personally identifiable like your name, address, email address, or phone number, and that is not otherwise publicly available. Where applicable we explicitly point out the use of personally identifiable data within our privacy policies. All other data is anonymous to us or is used pseudonymously.

3. Information Collection and Use

3.1 Information Collection:

We may collect and process the following personal information or data (information that can be uniquely identified with you) about you, we may ask this information:

- 3.1.1 Certain information required while using/ accessing the Website/Platform, including but not limited to your name, address, date of birth and following information:
- 3.1.2. Your e-mail address and a password;
- 3.1.3. A mobile number;
- 3.1.4. A record of any correspondence between you and us;
- 3.1.5. Employment details
- 3.1.6. Educational qualification(s).
- 3.1.7. Information regarding your use of our Services through the Website/Platform including your location details and personal information that you post in your Profile, wants, or feedback, and any comments or discussions you post in any blog, chat room, or other correspondence on the Website/Platform.

Your replies to any surveys or questionnaires that we may use for research purposes.

By continuing to use our Website/Platform you are deemed to have read the Privacy Policy and understood the purpose for which your Personal or Non-Personal Information is being collected and how the same shall be used and granting your express consent to such purpose and use. If, at a later date, you wish to withdraw this consent, please send us an email at info@startupbuddy.co.in.

Information Collected Automatically: When you use the Platform, we automatically receive and record information on our server logs from your browser or mobile, including but not limited to your hardware model, browser type, IP address, operating system version, unique device identifiers, and mobile network information including phone number, location, URL that you just came from (whether this URL is on our Platform or not), which URL you next go to (whether this URL is on our Platform or not), your computer browser information, your ISP, and other technical information. We may also collect information about how your device has interacted with our Platform, including the pages accessed and links clicked. We treat this data as Non-Personal Information, except where we are required to do otherwise under applicable law.

3.2 Use of Your Personal Information:

- 3.2.1 Startup Buddy gathers personal information from you from time to time in order to enhance existing offerings or provide additional Services. Startup Buddy collates the information essential for understanding Users in such a way as to provide better Services.
- 3.2.2 Any personal information given to us through Startup Buddy Website/Platform is used exclusively by Startup Buddy unless otherwise mentioned on the Startup Buddy Website/Platform. Startup Buddy does not make this information available to third parties who trade or rent information for direct marketing purposes.
- 3.2.3 We shall use your personal information for studying trends and preferences.

- 3.2.4 From time to time, we may use your Personal Information to send important notices, such as communications and changes to our terms, conditions and policies.
- 3.2.5 We may also use Personal Information for internal purposes such as auditing, data analysis and
- 3.2.6 Research to improve Startup Buddy's Services and customer communications
- 3.2.7 To use the User information in order to comply with country laws and regulations
- 3.2.8 To customize the Platform and Software content, layout, and Services
- 3.2.9 To provide you with a smooth, efficient, safe and customized experience while using the Platform and/or Software and
- 3.2.10 You agree that we may use your Personal Information in the file we maintain about you, and other information we obtain from your current and past activities to: resolve disputes; troubleshoot problems; help promote safe trading; measure consumer interest in the Services provided by us; inform you about online and offline offers, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our Terms of Use; and as otherwise described to you at the time of collection.

4. Collection and Use of Non-Personal Information

We also collect non-personal information (data in a form that does not permit direct association with any specific individual). We may collect, use, transfer and disclose non-personal information for any purpose.

Given below are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as industry, language, pin code, area code, unique device identifier, Location and the time zone where the Services are used so that we can better understand customer behavior and improve our Services.
- We also may collect information regarding customer activities on our Startup Buddy Website/Platform and from our affiliate businesses. This information may be aggregated and used to help us provide more useful information to our customers and to understand which parts of our Website and Services are of most interest. Such aggregated data shall be considered as non-personal information for the purposes of this Privacy Policy.
- Startup Buddy also may monitor customer traffic patterns and Website usage to help refine and improve the design and layout of the Startup Buddy Website/Platform as well as the

User experience. As a result, Startup Buddy automatically tracks certain information about the Users. This information includes the Users' browser type, most recent URL and the next URL that the User visits, regardless of whether these URLs are on the Startup Buddy Platform or not. Startup Buddy will also track visitors' IP addresses. We use this information to, among other things, identify broad demographic trends that may be used to provide information tailored to users' interests. In the event we combine any non-personal information along with any personal information, the combined information will be treated as personal information for as long as it remains combined.

Aggregate Information: We will also use Personal Information and non-personally identifiable information and other information (including information from online and offline third party sources) to create aggregated data for analytical and other purposes. We use this information to do internal research on your demographics, interests, and behavior to better understand, protect and serve You. This information is compiled and analyzed on an aggregated basis. Unless otherwise stated in this Privacy Policy, We only use this data in aggregate form.

Email/SMS Communications: The Website/Platform may use your Personal Information for the aforementioned purposes of the Website/Platform. You have full control regarding which of these emails and SMS You want to receive. If You decide at any time that You no longer wish to receive such communications from us, please follow the unsubscribe instructions provided in any of the communications. Please note that once we receive your request, it may take an additional period of time for your opt-out to become effective. All Users receive administrative emails and text messages. From time to time, we may reveal general statistical information about our Website/Platform through emails and messages.

5. Information Sharing

We also use your information (and the information you provide to us) to perform and provide you with the Services and to communicate with you. We will not share personal information about you with other people or nonaffiliated companies, unless we have your permission, or under the following circumstances:

- We may share any of the information we gather about you with third party agents and service providers to facilitate the operation of the Services offered by Startup Buddy Website/Platform, to provide the Startup Buddy Website/Platform and our Services or functions on our behalf and to perform related services (e.g., without limitation, maintenance services, database management, web analytics and improvement of the Service's features, or

to process credit card payments), or to assist us in analyzing how the Startup Buddy Website/Platform and Services are used. These third parties may have access to personal information needed to perform their functions, but may not use it for other purposes.

- We will cooperate with government and law enforcement officials and private parties to enforce and comply with the law and will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, to protect our property and rights or those of a third party, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable.
- We may share aggregated information that does not include personal information and we may otherwise disclose such information with third parties for industry analysis, demographic and analytical profiling and other purposes. Any aggregated information shared in these contexts will not contain your personal information.
- We may sell, transfer or otherwise share some or all of our assets, which could include your personal information, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

6. Cookies and Other Technologies

Startup Buddy Website/Platform may use “cookies” and other technologies such as pixel tags. These technologies help us better understand user behavior, tells us which parts of our Website/Platform users have visited and facilitates and measures the effectiveness of advertisements and web searches. A cookie is a small piece of information that a website can send to your browser which may then be stored on your computer's hard drive. It acts as an anonymous tag that identifies your computer, but not you personally. Cookies have the ability to store information about web pages viewed and the advertisements viewed or clicked. For registered customers, cookies can also save user information and screen preferences. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by law, we also treat these identifiers as personal information.

We use cookies and other technologies to remember personal information when you use our Website, Services and applications. Our goal, in these cases, is to make your experience with Startup Buddy more convenient and personal. We gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type

and language, internet service provider (ISP), referring and exit pages, operating system, date/time stamp and click-stream data. We use this information to understand and analyze trends, to administer the Website, to learn about user behavior on the Website and to gather demographic information about our user base as a whole.

Pixel tags, also known as a clear GIF or web beacon, are invisible tags placed on certain pages of our Website but not on your computer. When you access these pages, pixel tags generate a generic notice of that visit. They usually work in conjunction with cookies, registering when a particular computer visits a particular page. If you turn off cookies, the pixel tag will simply detect an anonymous website visit. Pixel tags enable us to send email messages in such a format that customer can read and they tell us whether the email has been opened by the customer. We may use this information to reduce or eliminate messages sent to customers.

If you want to disable cookies you can modify your settings on your browser in order to reject automatic acceptance of cookie. You can check with your provider to find out how to disable cookies. However, certain features of the Website may not be available once cookies are disabled.

7. Your ability to edit and delete your account information and preferences

You can edit your Account Information. We reserve the right to send you certain communications, such as service announcements and administrative messages and other communications relating to the Services.

8. Security

Startup Buddy Website/Platform has various electronic, procedural and physical security measures in place to protect the loss, misuse and alteration of information, or any accidental loss, destruction or damage to data. When you submit your information via Startup Buddy Website/Platform, your information is protected through security systems. There may be instances where we require proof of identity before disclosing any of your information to you. You agree to be responsible to protect the security of your username and password and other registration details, if any. We take reasonable security measures and procedures, and as specified by applicable law, to maintain appropriate physical, technical and administrative security to help prevent loss, misuse, or unauthorized access, disclosure or modification of Personal Information. While we take these reasonable efforts to safeguard your personal information, you acknowledge and agree that no system or transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things,

signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for the unauthorized use of your information or for any lost, stolen, compromised passwords, or for any activity on your Account via unauthorized password activity.

We may create links to other websites. You are requested to be aware that we do not provide any personally identifiable information to such other websites and that we are not responsible for the privacy practices of third parties. You agree that Startup Buddy cannot control these links and we shall not be responsible for any use of such websites. We encourage you to read the privacy statements on all such websites as their policies may differ from ours. You agree that we shall not be liable for any breach of your privacy of Personal Information or loss incurred by your use of these websites. We are not responsible for the privacy policies and/or practices on other sites. This Privacy Policy only governs information collected by us.

If you have any questions about the security at the Startup Buddy Website/Platform, you may contact us. Please be aware, however, that despite our efforts, no security measures are impenetrable.

9. Integrity and Retention of Data

Startup Buddy makes it easy for you to keep your personal information accurate, complete and up to date. We will retain your personal information and any data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

10. Modification

Startup Buddy reserves the right to amend this Privacy Policy at any time. The policies, as and how modified, shall be updated on the Startup Buddy Website/Platform and the same shall be notified on the respective Startup Buddy Website/Platform. We encourage you to review this Privacy Policy whenever you visit the Startup Buddy Website/Platform.

11. Contact for any query

In case, you have any questions about this Privacy Policy, our Services, or your dealings on the Startup Buddy Platform, you may contact a representative of Startup Buddy Services Private Limited by e-mailing us at info@startupbuddy.co.in.

12. Grievance Officer

In accordance with Information Technology Act 2008 and rules made there under, in case of grievances you can contact:

Startup Buddy Services Private Limited, at 3011, LGF, Sector-46,Gurgaon-122002
info@startupbuddy.co.in.

In the event you wish to make a complaint regarding any violation of the provisions of the Privacy Policy, you may send a written complaint to the Grievance Officer, who shall redress the complaint within one (1)month.

This Privacy Policy was last updated on 26th December, 2019.

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