

## PRIVACY POLICY

This Privacy Policy Statement (the “**Policy**”) outlines ScaleX Business Private Limited (“**We**” or “**Us**” or “**Our**” or “**ScaleX**”) practices in relation to the storage, use, processing, and disclosure of personal data that the user (“**You**” or “**Your**” or “**User**”) has chosen to share with Us when You access Our website (the “**Website**”).

This Privacy Policy (“**Privacy Policy**”) is published in compliance with:

- Section 43A of the Information Technology Act, 2000;
  - Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011; and
  - Rule 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011.
- A. At Scalex, We are committed to protecting Your personal data and respecting Your privacy. Please read the following terms of the Policy carefully to understand our practices regarding Your personal data and how We will treat it. This Policy sets out the basis on which any personal data We collect from You or about You, or that You provide to Us, will be processed by Us.
- B. Capitalised words in the Policy shall have the same meaning ascribed to them in the Terms and Conditions (“**Terms**”), available at <https://scalexbusiness.com/terms/>. Please read this Policy in consonance with the Terms.
- C. By using the Website, You consent to the collection, storage, use, transfer, and disclosure of Your personal data, in accordance with, and are agreeing to be bound by, this Policy.

### 1. INFORMATION WE COLLECT ABOUT YOU

- 1.1. Personal data, or personal information, means any information about an individual or an organisation or an entity which allows identification and authentication. It does not include data where the identity has been removed .
- 1.2. We collect, use, store, and transfer personal data about You in connection with Your use of the website. Such personal data includes:
- a. Identity data - We may collect information and data pertaining to Your identity and contact data (email, phone number, name, business address, home address, fax number) in order for Us to provide services to You;
  - b. Business data- ScaleX may acquire data on Your relevant business activities, information required for a project or client contractual terms given to Us voluntarily provided by You;
  - c. Device data- We may collect any relevant device data which includes IP addresses, browser types and versions, time zone settings, and locations;
  - d. Usage data - Any other data including information about how You use Our Website may be collected by ScaleX;

- e. Services data- We may collect any other data required to perform the services. ScaleX may also acquire personal data from a third party with Your consent to perform any services; and
- f. Visitor Information- When You visit Our Website, We may collect specific information and data related to IP address and the pages You visited and when You use Our services. We may collect information on how You use those services.

1.3. We also collect, use, and share aggregated data such as statistical or analytical data for any purpose. Aggregated data could be derived from Your personal data and does not personally identify You. For example, We may aggregate Your usage data to calculate the percentage of users accessing our Website from a specific geographical area.

## **2. HOW WE USE YOUR PERSONAL DATA AND FOR WHAT PURPOSES**

- 2.1. We will only use Your personal data as the law allows us to. We shall use the information provided by You to contact You, or where We need to comply with a legal obligation.
- 2.2. You understand that when You consent to providing Us with Your personal data, You also consent to Us disclosing such data to third parties. In general, We disclose your personal data to manage our relationship with You, in connection with the services, or to provide the Website to You.
- 2.3. You are aware that by using Our Website, You authorise Us, Our associate partners, and affiliates to contact You through email, phone, or any other means otherwise. This is to ensure that You are aware of all the services offered by ScaleX.
- 2.4. You are aware that any and all information pertaining to You, whether or not You directly provide to Us, including but not limited to personal correspondence such as emails, chats, etc., may be collected, compiled, and shared by Us in order to render services to You and You expressly authorise Us to do so. This may include but not be limited to storage providers, data analytics providers, consultants, lawyers, and auditors. We may also share this information with Our affiliates.
- 2.5. You agree and acknowledge that We may share data without Your consent, when it is required by law or by any court or government agency or authority to disclose such information. Such disclosures are made in good faith and belief that it is reasonably necessary to do so for enforcing this Policy or the terms of the arrangement we have with You, or in order to comply with any applicable laws and regulations.

## **3. WEBSITE**

We use different methods to collect and process data about You. Such information would include the following :

- 3.1. Information You give Us - The information (including identity, contact, and communications data) You consent to giving Us about You when You use Our Website or

by corresponding with Us (by email or chat). Such information would include any form of information provided to Us when We contact You and any other information that You provide. If You contact Us, We will keep record of the information.

- 3.2. Information We collect about You- Each time You visit Our Website, We will automatically collect personal data including device and usage data. We collect this data using cookies and other similar technologies.

#### **4. AUTHENTICITY OF INFORMATION**

- 4.1. You agree that the information and personal data You provide Us with is true, correct, and accurate. We shall not be liable for any incorrect or false information or personal data that You might provide Us.
- 4.2. You may review the information and personal data that You have provided during your use of the Website and choose to correct or modify this as well. You may do so by writing to us or our Grievance Officer as specified in Clause 10 of this Policy.

#### **5. TRANSFER OF PERSONAL DATA**

- 5.1. Personal information may be transferred, accessed and stored outside India as necessary for carrying out services by Us. ScaleX shall take all measures necessary to protect Your personal information.
- 5.2. Before transferring Your data outside India, We shall obtain Your consent for the transfer to be made and We shall take steps to ensure that Your personal data continues to receive a standard level of protection.
- 5.3. We shall take adequate measures to ensure that such transfer of data is compliant with the applicable international data protection regulations in the respective country where such data is transferred or stored.
- 5.4. If Your data is transferred to or processed or stored in Singapore, We shall comply with the relevant provisions of the Singapore's Personal Data Protection Act, 2012 and respective rules.
- 5.5. ScaleX will not intentionally disclose or transfer (and will take reasonable steps to prevent the unauthorized or accidental disclosure of) Your personal data to third parties without Your consent or as otherwise permitted by law for such third parties' own marketing purposes.

#### **6. SECURITY OF DATA**

- 6.1. We take appropriate protocols to protect Your personal data from loss, misuse, unauthorised access or disclosure, alteration or destruction using the same safeguards as We use for Our own proprietary information.

6.2. We have put in place measures such that Your personal information in Our possession or under Our control is destroyed and/or anonymised as soon as it is reasonable to assume that: (a) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (b) retention is no longer necessary for any other legal or business purposes.

## **7. ADDITIONAL INFORMATION**

You are not under any obligation, either contractually or statutorily to provide any of Your data to Us. We shall not be able to provide you with any services such as newsletters and insights, if You do not provide Us contact details.

## **8. THIRD PARTY WEBSITES**

We are not responsible for the privacy practices of any third party operated websites, mobile apps or other digital services, including those that may be linked through ScaleX Website or services, and We encourage You to review the respective privacy policies published on such third party websites.

## **9. COOKIES**

9.1. We collect data by way of 'cookies'. Cookies are small data files which are sent to Your browser from the Platform and are stored on Your computer or device (hard drive). The cookies shall not provide access to data in Your computer or device such as email addresses or any other data that can be traced to You personally. The data collected by way of cookies will allow Us to administer the Website and provide You with a tailored and user-friendly service. The cookies shall enable You to access certain features or services of the Website. Most web browsers and devices can be set to notify when You receive a cookie or prevent cookies from being sent.

9.2. Cookies helps Us adapt Our Website to provide more relevant and accessible information. For example, cookies allow Us to ensure that the information displayed on Your next visit to our Website will match up with Your preferences. You may configure Your browser to accept all cookies, reject all cookies, or notify You when a cookie is sent. Please note, however, that disabling cookies might affect Your online experience and/or prevent You from taking full advantage of Our site.

## **10. DATA RETENTION**

You are aware that Your personal data will continue to be stored and retained by Us for a reasonable period after termination of Your use of Our Website. We may also retain personal data for longer than the duration of the business relationship should We need to retain it to protect ourselves against legal claims, use it for analysis or historical record-keeping, or comply with our information management policies and schedules. If You request that We delete Your

personal data, We will make reasonable attempts to delete all instances of the information in their entirety.

#### **11. BUSINESS TRANSITIONS**

You are aware that in the event We go through a business transition, such as a merger, acquisition by another organisation, or sale of all or a portion of our assets, Your personal data might be among the assets transferred.

#### **12. CHANGE IN PRIVACY POLICY**

We keep our Policy under regular review and may amend this Policy from time to time, at Our sole discretion. We would update our Privacy Policy as and when needed. If We make any material changes, We will notify You by means of a notice on this Website, prior to the change becoming effective. We encourage You to periodically visit this page for the latest information on our privacy compliance. In any case, Our commitment to protect the privacy of Website Users will continue to remain.

#### **13. GRIEVANCE OFFICER**

You may contact Us at [hello@scalexbusiness.com](mailto:hello@scalexbusiness.com) with any enquiry relating to this Policy or an enquiry relating to Your personal information (including reviewing or updating). You can also do so by writing to Our Grievance Officer, established in accordance with the Information Technology Act, 2000 and rules made thereunder, at the address provided below:

Name: Sharath AK

Email Address: [hello@scalexbusiness.com](mailto:hello@scalexbusiness.com)