

# PRIVACY POLICY

## 1. *Introduction and Background*

We welcome you to use our website i.e., [www.satsure.co](http://www.satsure.co) and the product(s), services(s), data and content available therein (together referred to as "website and services"). This agreement is entered between SatSure Analytics India Pvt Ltd (including its affiliates) (together referred to as "SatSure") and the person entering into these terms or the company/entity on behalf of whom the person is entering into these terms ("Customer") (referred to as "User", "You", "Your" etc.). This agreement is effective from the date of You visiting our website.

In connection with providing you the access to our website and services we will be collecting certain data and information from our users directly. In addition, as managers of the website and services, we also monitor and track our users' experiences while accessing and using the website and services. In order to provide you, the user, clarity on what information we collect or generate, for what purpose we use such information and any other areas of interest around such data collection and processing, we have outlined the same for your information and consent.

## 2. *Information submitted by users (User Submitted Information)*

- a. While using the website and services, you will be asked to provide the following details,
  - i. First Name
  - ii. Last Name
  - iii. Email address
  - iv. Contact number
- b. During the course of using the website and services, you may upload personally identifiable information or

personal information protected by privacy rights provided by third parties. You are expected to anonymise this information and then upload it onto the website and services. You remain solely responsible for protecting and preserving the privacy rights of such third parties.

- c. As you alone have control over compliance with applicable privacy regulations in relation to the data of third parties, we expect you to keep us protected, render us harmless and keep us indemnified in the event of any allegations of breach of privacy rights or claims in relation thereto being brought by such third parties.

## 3. *Information we observe (Observed User Information)*

- a. During the course of your usage of the website and services, as the operators and managers of the website and services, we reserve the right to monitor the behaviour of the user(s) including your behaviour in order to ensure it is compliant with applicable laws as well as the terms of use.
- b. Furthermore, as we wish to ensure a seamless experience for the users of the website and services, we are continuously looking for opportunities to improve the overall functionality and look and feel of the website.
- c. In order to meet the objectives at (a) and (b) above, we will monitor, track and store the following information through manual and automated tools such as cookies and google analytics,
  - i. The pages you visit on the website and how long you remain on each page.

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- ii. What features you use on the website and services and how many times you have used these features.
  - iii. The details of what application programming interfaces you have requested and your reasons for such requests.
  - iv. The Application Program Interface that you upload onto the website and services
- c. Observed User Information is used to primarily improve the functionality, look and feel of the website and services.

#### **4. Processing of Information**

- a. User Submitted Information is primarily used to i) contact you regarding either the usage of the website and services or for discussing either the possibility of or actual terms of a commercial engagement, if any, ii) in case, for any noncompliance of either applicable laws or terms of use of the website and services, the user submitted information will be used to serve notices or initiate legal proceedings, iii) We may also use this information to contact you regarding our products and services.
- b. While you can elect and choose not to have the user submitted information leveraged for the purposes enumerated at (a) (iii) above without any disruption of your access to the website and services, your decision, if any, to terminate our right to use the user submitted information at (a) (i) and (ii) above or have us erase the user submitted information will lead to permanent loss of access to and usage of the website and services. You can also choose to access the user submitted information by contacting us at [support@satsure.co](mailto:support@satsure.co)
- d. From both user submitted information and observed user information, we may develop insights or identify trends and information that could potentially lead to ideas for new products and services at SatSure or for improvement of existing products and services. We retain absolute and exclusive ownership over such insights or identified trends and information ("SatSure Generated Output").
- e. While posting any information or submitting any data or information or any other material on the website and services including articles and comments therein, do bear in mind that such posting or publication of information will lead to unfettered access in respect of the same by us and the other users. In such a situation, if the material or data or information you have posted or published is meant to be retained as a trade secret or confidential information, your actions in posting or publishing the same will disqualify the same as a trade secret or as confidential information. In such a scenario, you may also lose your ability to enforce any intellectual property rights in respect of such published or posted information, data or material.
- f. The information can be shared, without obtaining prior permission from User with government agencies deriving lawful authority to summon such information.
- g. If we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be

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notified via email and/or a prominent notice on our Web site of any change in ownership or uses of this information, as well as any choices you may have regarding this information

### 5. *Safety and Security of Information Stored*

- a. As of date, Indian laws require us to employ “reasonable security practices” to ensure safety and security of both, the user submitted information and observed user information. At SatSure, we have gone above and beyond the legal requirements by storing both sets of information with Amazon Web Services, whose encryption and security features are compliant with European General Data Protection Regulations.
- b. We understand data security is a concern in the world of the internet. Unfortunately, we are not in a position to give you an absolute assurance that the data you submit to us will be 100% safe. However, we employ reasonable technologies such as Secure Socket Layer (SSL) encryption to keep your data safe.
- c. If despite our efforts as disclosed in sub clause (a) and (b) above, there is a breach of security in respect of any user submitted information or user observed information, having discharged every duty under law to ensure safety and security of your information and data, we disclaim any liability or responsibility of consequential losses or damages. At best, we can notify you of such breach of security or safety of your data or information as soon as we

have had a chance to review the nature and extent of such breach.

### 6. *Duration of Storage*

- a. We will not store user submitted information upon the expiry or termination of your use and access to the website, except where such storage is required by law<sup>1</sup>.
- b. However, we do reserve the right to anonymize and de-identify Observed User Information and store the anonymized Observed User Information for a period of 10 (ten) years.
- c. As SatSure Generated Outputs belong to us exclusively, we retain the right to store, use and process the same for perpetuity.

### 7. *How we endeavour to keep in touch with you*

- a. As a privacy conscious organization, we are committed to ensuring a culture of privacy compliance through a dynamic relationship with our users. Accordingly, we have created a hotline email address, i.e., [support@satsure.co](mailto:support@satsure.co) and contact number +91 6360680536 You may contact us on the said email address anytime of the day or night and on the said number between 10 am and 7 pm Indian Standard Time to notify us of the following,
  - i. Any defects or bugs in the website and services that has an implication on the privacy of either user submitted information or observed user information.
  - ii. Any information of any loss of privacy of any user submitted

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<sup>1</sup> For example, your financial and tax related information will be stored for as long as the laws applicable to us, namely the laws of India, require it to be stored.

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- information or observed user information.
- iii.* Details of any user submitted information or observed user information or modification of such user submitted information except SatSure Generated Outputs.
  - b.* Information collected as per sub clause (a) above shall be treated as Observed User Information.
  - c.* We also ask that you store the hotline email address in your records. Any changes in this privacy policy will be notified to you from the said email address and will require your consent. If we do not receive consent for any such modified terms of the privacy policy, we will have no option but to temporarily suspend your continued access to and use of the website and services until we have a clear explicit understanding on whether you are agreeable to the modified privacy policy.
  - d.* If you have any specific queries regarding our practices for the protection of user submitted information, please contact us at the hotline email address and we will be happy to share any details with you that is not confidential. However, we would be likely to keep some aspects of our data protection secret from the general public, for the very purpose of preventing any hacks or breaches by virtue of the details of our encryption technology becoming leaked in the public domain.

### ***8. Governing Law and Dispute Resolution***

- a.* Without prejudice to conflict of law principles, any information or data

submitted by you on the website and services and your usage of and access to the website and services and this privacy policy, will constitute a legally binding agreement for SatSure to collect, use, process and store User Submitted Information and Observed User Information and the laws of India and the State of Karnataka will exclusively govern the same.

- b.* The court(s) of law at Bengaluru will have exclusive jurisdiction over this policy and all claims or disputes arising thereunder.

### ***9. Consent***

We presume that by accessing and using the website and services, you are at the very least the age of 18 years and do not suffer from any health problems that render you legally incapable of entering into contractual relations (“contractual capacity”). We presume that in the event you do not possess contractual capacity, a legally authorised representative in the form of either a parent or a guardian or a court appointed guardian has consented to this policy on your behalf.

In case of contractual capacity being lacking in the user, we also reserve the right, though we are not obligated, to collect the information of the legally authorised representative solely for the purposes of contacting them for verifying consent. You are requested to be honest and truthful in this regard in order to ensure legal compliance.

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Accordingly, by clicking consent, you hereby consent to this privacy policy.