

PRIVACY POLICY

Last updated: [25th August 2021]

Welcome to Spottabl's privacy policy ("Privacy Policy" or "Policy").

This Policy outlines **Connectecho Talent Labs Private Limited's** and its affiliates' (collectively, "Spottabl", "we" or "us") practices in relation to the collection, storage, usage, processing, and disclosure of personal data that you have chosen to share with us when you access our website available at www.spottabl.com ("Platform") or avail services that we offer you on or through the Platform (collectively, the "Services").

At Spottabl, we are committed to protecting your personal data and respecting your privacy. In order to provide you with the Services, we have to collect and otherwise process certain data about you. This Policy explains how we process and use personal data about you.

Please note that unless specifically defined in this Policy, capitalised terms shall have the same meaning ascribed to them in our Terms and Conditions, available at [insert link] ("Terms"). Please read this Policy in consonance with the Terms.

By using the Platform or Services, you confirm that you have read and agree to be bound by this Policy and consent to the processing activities described under this Policy.

Please refer to Section 1 to understand how the terms of this Policy apply to you.

1. BACKGROUND AND KEY INFORMATION

(a) About Us:

The Services are made available to you by Spottabl. If you have any questions about this Policy, how we process or handle your personal data, or otherwise, you may reach out to us with your queries, grievances, feedback, and comments at [satheesh@spottabl.com] or contact our grievance officer whose details are provided below.

Name: Satheesh K V

Designation: Grievance Officer

Email: satheesh@spottabl.com

(b) How this Policy applies:

This Policy applies to individuals who use our Services. For the avoidance of doubt, references to "you" across this Policy are to an end user who avails our Services.

Certain jurisdictions require you to consent to the processing of your data, or otherwise require you to accept the terms of this Policy. In this regard and subject to the data

protection laws that apply to you, by using the Services, you agree and consent to the collection, use, storage, disclosure, and sharing of your information as described and collected by us in accordance with this Policy. Please contact us if you have questions on our practices in your country or region.

(c) Review and Updates:

We regularly review and update our Privacy Policy, and we request you to regularly review this Policy. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

(d) Third-Party Services:

Our Services may include links to third-party websites, plug-ins, services and applications (“**Third-Party Services**”). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these Third-Party Services and are not responsible for their privacy statements. When you leave the website or access third-party links through the Services, we encourage you to read the privacy policy of such third-party service providers.

2. PERSONAL DATA THAT WE COLLECT

(a) We collect different types of personal data about you. This includes, but is not limited to:

- (i) **Contact Data**, such as your mailing or home address, email addresses, and mobile numbers.
- (ii) **Identity and Profile Data**, such as your name, username or similar identifiers, LinkedIn profile, credit information, and gender.
- (iii) **Marketing and Communications Data**, such as your address, email address, information posted in service requests, offers, wants, feedback, comments, pictures and discussions in our blog and chat boxes, responses to user surveys and polls, your preferences in receiving marketing communications from us and our third parties, and your communication preferences.
- (iv) **Technical Data**, which includes your IP address, browser type, internet service provider, details of operating system, access time, page views, device ID, device type, frequency of visiting our website and use of the Services, website and mobile application activity, clicks, date and time stamps, and other technology on the devices that you use to access the Services.
- (v) **Transaction Data**, such as details of the Services you have availed, your credit or debit card details, and UPI IDs for processing payments.

- (vi) **Usage Data**, which includes information about how you use the Services and your activity on the Platform, user taps and clicks, user interests, time spent on the Platform, details about user journey, and page views.
- (b) We also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data under law as it does not directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.
- (c) What happens if I refuse to provide my personal data?

Where we need to collect personal data by law, or under the terms of a contract (such as the Terms), and you fail to provide that data when requested, we may not be able to perform the contract (for example, to provide you with the Services). In this case, we may have to cancel or limit your access to the Services, but we will notify you if this is the case at the time.

3. HOW DO WE COLLECT PERSONAL DATA?

We use different methods to collect personal data from and about you including through:

- (a) **Direct Interactions.** You provide us your personal data when you interact with us. This includes personal data you provide when you:
 - (i) create an account or profile with us;
 - (ii) use our Services or carry out other activities in connection with the Services;
 - (iii) enter a promotion, user poll, or online surveys;
 - (iv) request marketing communications to be sent to you; or
 - (v) report a problem with the Platform and/or our Services, give us feedback or contact us.
- (b) **Automated technologies or interactions.** Each time you visit the Platform or use the Services, we will automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this personal data by using cookies, web beacons, pixel tags, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites that employ our cookies.
- (c) **Third parties or publicly available sources.** We will receive personal data about you from various third parties:
 - (i) Technical data from analytics providers and advertising networks; and
 - (ii) Identity and profile-related Data and Contact Data from publicly available sources.

4. HOW DO WE USE YOUR PERSONAL DATA?

(a) We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where we need to perform the contract we are about to enter into or have entered into with you, where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, or where we need to comply with a legal obligation. We use your personal data for the following purposes:

- (i) to verify your identity to register you as a user, and create your user account with us on the Platform;
- (ii) to provide the Services to you;
- (iii) to monitor trends and personalise your experience;
- (iv) to improve the functionality of our Services based on the information and feedback we receive from you;
- (v) to improve customer service to effectively respond to your Service requests and support needs;
- (vi) to process payments;
- (vii) to send periodic notifications to manage our relationship with you including to notify you of changes to our Services, send you information and updates pertaining to the Services you have availed, and to receive occasional company news and updates related to us or the Services;
- (viii) to market and advertise our Services to you;
- (ix) to comply with legal obligations;
- (x) to administer and protect our business and the Platform, including for troubleshooting, data analysis, system testing, and performing internal operations;
- (xi) to improve our business;
- (xii) to perform our obligations that arise out of the arrangement we are about to enter or have entered with you;
- (xiii) to enforce our Terms; and
- (xiv) to respond to court orders, establish or exercise our legal rights, or defend ourselves against legal claims.

(b) Where applicable laws permit us to, we rely on your consent as a ground to process your personal data. By using our website and/or by availing our Services, you hereby consent to the collection, use, and transfer of the information you disclose on the website in accordance with this Privacy Policy. This includes your consent for sharing your information with third parties for the purposes set out in this Privacy Policy.

(c) Where applicable law does not permit us to rely on your consent to process personal data, we rely on the following legal bases for processing your personal data:

- (i) **Legitimate interests**, which means our interest in conducting and managing our business to enable us to provide you with the best Services and products, and the best and most secure experience. We make sure we consider and balance any

potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- (ii) **Performance of a contract**, which means we process your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
 - (iii) **To comply with a legal obligation**, which means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.
- (d) We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- (e) Please note that we may process your personal data without your knowledge or consent, in compliance with the rules above where this is required or permitted by law.

5. COOKIES

- (a) Cookies are small files that a site or its service provider transfers to your device's hard drive through your web browser (if you permit it to) that enables the sites or service providers' systems to recognise your browser and capture and remember certain information.
- (b) We use cookies to help us distinguish you from other users of the Platform, understand and save your preferences for future visits, keep track of advertisements and compile aggregate data about site traffic and site interaction so that we can offer you a seamless user experience. We may contact third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.
- (c) Additionally, you may encounter cookies or other similar devices on certain pages of the Platform that are placed by third parties. We do not control the use of cookies by third parties. If you send us personal correspondence, such as emails, or if other users or third parties send us correspondence about your activities or postings on the Platform, we may collect such information within a file specific to you.
- (d) You can block cookies by activating the setting on your browser that permits you to refuse the setting of all or some cookies. However, if you use your browser settings to

block all cookies (including essential cookies), you may not be able to access all or parts of our Services.

6. DISCLOSURES OF YOUR PERSONAL DATA

- (a) We do not share, sell, trade, or otherwise transfer to any third parties or allow third party to access your personally identifiable information. However, we may share your personal data with third parties set out below for the purposes set out in Section 4:
- (i) Internal third parties, which are other companies within the Spottabl group of companies.
 - (ii) External third parties such as:
 - trusted third parties such as our associate partners, and service providers that provide services for us or on our behalf. This includes hosting and operating our Platform, providing marketing assistance, conducting our business, processing payments and transaction-related processes, transmitting content, and providing our Services to you;
 - service professionals to provide Services to you;
 - analytic service providers and advertising networks that conduct web analytics for us to help us improve the Platform. These analytics providers may use cookies and other technologies to perform their services; and
 - regulators and other bodies, as required by law or regulation.
 - (iii) Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If our business undergoes a change, then the new owners will use your personal data in the manner set out in this Policy.
- (b) We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. CROSS BORDER TRANSFERS OF YOUR PERSONAL DATA

- (a) The personal data that we process may be transferred to countries other than where you are based. For example, we transfer your personal data to the [United States and India], where our servers are located, or to third-party service providers that may be located in countries other than the one you are based in. Where applicable law permits such transfer, we rely on consent to transfer such data. You hereby consent to such transfer of your personal data.
- (b) You can find out more about these transfer mechanisms by contacting us.

8. DATA SECURITY

- (a) We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed without authorisation, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- (b) We also have in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of such personal data breach where we are legally required to do so.

9. DATA RETENTION

- (a) We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you. In case your information is no longer required for any purpose of lawful processing, then we will ensure it is disposed of in a secure manner.
- (b) In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

- (a) Depending on the data protection law applicable to you, you may have certain rights in relation to the processing of your personal data.
- (b) Subject to the data protection laws that apply to you, you may have the right to:
 - (i) **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
 - (ii) **Request confirmation** as to whether or not your personal data is being processed.
 - (iii) **Request the correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - (iv) **Request the erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- (v) **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or Services to you. We will advise you if this is the case at the time you withdraw your consent.
- (c) If you wish to exercise any of the rights set out above, please contact us at the details provided in Section 1(a).
- (d) We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- (e) We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. UPDATES TO THIS POLICY

- (a) We may occasionally update this Policy. If we make changes to this Policy, we will notify you of the changes through the Platform or through other means, such as email. To the extent permitted under applicable law, by using our Platform after such notice, you consent to updates made to this Policy.
- (b) We encourage you to periodically review this Policy for the latest information on our privacy practices.