

EMIZA SUPPLY CHAIN SERVICES PRIVATE LIMITED

Data Privacy and Security Policy

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1. Introduction

- a. **Emiza Supply Chain Services Private Limited**, (“**We**” / “**Us**” / “**Our**” / “**Company**” / “**Emiza**”) is a company duly incorporated under the provisions of the Indian Companies Act, 2013, which provides various logistics, supply chain & technology related services / platforms under the brand name “**Emiza**”.
- b. This privacy policy (“**Privacy Policy**”) applies to the use or access of the domain name/website www.emizainc.com, Emiza’s mobile application and any of the platform/tool developed by Emiza from time to time.
- c. The Privacy Policy constitutes an integral part of the agreements / terms and conditions of use between Emiza and its customers / merchants, its users/end customers and partners/affiliates.
- d. Our Website, mobile application and platforms/tools (both online and offline) developed by Emiza are individually referred to as the “**Platform**”.
- e. The Platform(s) inter-alia facilitates more comfortable form of e-commerce in relation to various technology related services including but not limited to logistics management services/solutions, checkout services, early/faster COD services and other services that the Company may provide to its Users from time to time whether online or offline (“**Services**”).
- f. The Services would be made available to such persons who have agreed to become user of the Platform (referred to as “**You**” or “**Your**” or “**Yourself**” or “**User**”, which term shall also include persons who are accessing the Platform merely as visitors or who undertakes any of the Service) in accordance with the Platform’s terms of use as may be formulated by Emiza and uploaded on the Platform from time to time (“**Terms of Use**”).
- g. **Emiza** considers user relationship and data security to be an important component of Our products and services offering through Our Website. We are committed to maintaining the confidentiality, integrity and security of any Personal Information (as defined below) of Our Users. We are proud of Our privacy practices and the strength of the security controls in relation to Our Platform and want the User to know how We protect information of the User and use it to provide Our Services to the User.
- h. This Privacy Policy gives a broad outline as to how We protect information provided by Users during the course of access and usage of the Platform. We constantly re-evaluate this Privacy Policy and adapt it to meet data security standards and to deal with new challenges.
- i. Please read this Privacy Policy carefully while accessing or using the Platform or availing of any Services provided by the Company. You agree to be bound by the terms described herein. By indicating Your acceptance of this Privacy Policy on our Platform and/or physically, You hereby consent to the collection, processing, usage, transfer of your Personal Information (including sensitive personal information) in accordance with this Privacy Policy.

2. Purpose:

This Privacy Policy has been designed and developed to help You to understand the following:

EMIZA SUPPLY CHAIN SERVICES PRIVATE LIMITED

- a. The type of Personal Information (including Sensitive Personal Data or Information) and Non-Personal Information that we collect from the Users;
- b. The purpose of collection, means and modes of usage of such Personal Information & Non-Personal Information by the Company;
- c. How and to whom the Company will disclose such information;
- d. How the Company will protect the Personal Information including Sensitive Personal Data or Information and Non-Personal Information that is collected from the Users; and
- e. How Users may access and/or modify their Personal Information and Non-Personal Information.

3. Definitions

In this Privacy Policy: (i) capitalized terms defined by inclusion in quotations and / or parenthesis have the meanings so ascribed; and (ii) the following terms shall have the following meanings assigned to them herein below:

- a. **"Applicable Law"** includes all applicable Indian statutes, enactments, acts of the state legislature or parliament, laws, ordinances, rules, bye-laws, regulations, notifications, guidelines, directions, directives and orders of any governmental authority, statutory authority, board, as may be applicable and in each case, any implementing regulation or interpretation issued thereunder including any successor applicable law;
- b. **"Agents"** refers to such entities, or persons engaged by, or associated/affiliated with the Company in connection with the Company's business activities in any form;
- c. **"Our Website"** shall mean and include <https://emizainc.com>" <https://emizainc.com> including its sub domains, mobile & desktop application of the Company, including any successor website/ applications, any website of related entity or any other channel facilitated and permitted by the Company including but not limited to any other digital medium including phone, displays, emails, social media interfaces, messaging interfaces, wallet, payment intermediaries using Company's interface;
- d. **"Non-Personal Information"** shall have the meaning as provided under Paragraph 3(f) of this Privacy Policy;
- e. **"Person"** shall mean any individual (including personal representatives, executors or heirs of a deceased individual) or legal entity, including but not limited to, any partnership, joint venture, corporation, trust, unincorporated organisation, limited liability company, limited liability partnership or governmental authority;
- f. **"Personal Information"** shall mean any information that relates to the User, which, either directly or indirectly, is capable of identifying the person concerned and as the details of the User as specified under Paragraph 4a of this Privacy Policy;
- g. **"Sensitive Personal Information"** shall mean personal information of a User relating to password; financial information such as bank account or credit card or debit card or other payment instrument details; physical, physiological and mental health condition; sexual orientation; medical records and history; biometric information; any detail relating to the above as provided to or received by the Company for processing or storage. However, any data/information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law shall not qualify as Sensitive Personal Data or Information or Personal Information.
- h. **"User" / "You" / "Your"** shall mean any natural or legal person who has access to and is using the Platform; and

EMIZA SUPPLY CHAIN SERVICES PRIVATE LIMITED

- i. **“User Information”** shall have the meaning as provided under Paragraph 4c & 4d of this Privacy Policy.

4. Collection, Storage and Use of Information

a. Personal Information:

- i. We may collect Your Personal Information when You voluntarily and successfully submit information against relevant fields on the Platform. Personal Information is the data that, alone or in combination with any other information, can be used to uniquely identify You (**“Personal Information”**). Personal Information may include, without limitation, the following:
 - Name
 - User ID(s)
 - Phone numbers
 - Password chosen by the User
 - Email address (es)
 - Mailing address (es) (including country and Zip / Postal code)
 - Geographical location through the IP address of the Users
 - Financial account information like bank account details, GST certificate, PAN Card, MSME, TAN, etc. and transactional information in relation to transactions where the Company is involved
 - Banking and other financial data
 - Government identification numbers, e.g., driver’s license number
 - Date of birth
 - Age
 - Gender
 - Health and disability data
 - Family information
 - Financial and asset information
 - Such other information that may be requested by third party service providers associated with the Platform for accessing services provided by them.
 - Any of the aforesaid information pertaining to the customer / buyer of the User.
 - All other personally identifiable information / details as the User may share from time to time (including personally identifiable information / details of the customer / buyer of the User).
- ii. In particular, if You register/log-in on the Platform through any social media platform (for example, Google, Facebook, Microsoft, Amazon, Apple, Shopify, etc.), then We may collect the following information:
 - The email/phone number used on the social media platform to register/ log-in;
 - The display name connected to the relevant social media account used; and
 - The profile image (if any) connected to the relevant social media account used.
- iii. Please note that the information We obtain from such social media accounts also depends on the privacy policies of the social media platforms and Your respective settings therein. Please check the respective policies to understand the privacy practices of those social media platforms.

EMIZA SUPPLY CHAIN SERVICES PRIVATE LIMITED

- iv. In case of Agents, We may request such additional Personal Information as may be specified in or as part of the respective agreement between the Company and the Agent.
- v. Purpose of Collection of Personal Information: Your Personal Information is collected when You voluntarily submit such information. It is used, handled and stored by Us for the purposes of Your identification/ verification and/or creation of Your account on the Platform and/or for accessing services provided through the Platform. Accordingly, such information shall be retained by Us till the time You have access and use the Platform or You communicate to Us Your decision to withdraw Your permission to store and retain such information.
- b. Non-Personal Information:
 - i. When You visit Our Website or use the Platform, We may collect certain non-personal information for the purpose of enhancing Your use of Our Website and/or the Platform ("**Non-Personal Information**"). This Non-Personal Information is in the nature of technical and navigational information generated each time You visit the Our Website or use the Platform, which are saved in Our server logs. The Non-Personal Information may include, without limitation, the following details in respect of:
 - o User's browsing history that includes the Uniform Resource Locator (URL) of the site that the User visited prior to visiting the platform as well as the the server / Internet Protocol (Internet Protocol) address of each User's computer (or the proxy server a User used to access the World Wide Web) from where Our Website is being accessed;
 - o The browser and operating system used to browse Our Website;
 - o name of the Internet Service Provider (ISP)
 - o links clicked, scrolled and pages visited;
 - o details of Your last visit to Our Website or use of the Platform, including time, date and the duration of Your session on Our Website, etc.; and/or
 - o cookies as per Paragraph 4 of this Privacy Policy.
 - ii. Purpose of Collection of Non-Personal Information: Non-Personal Information is in the form of encrypted statistics, which helps Us in improving the efficiency of the Platform by giving Us information relating to Your use of the Platform.
- c. Personal Information, Non-Personal Information and Sensitive Personal Information are together referred to as "**User Information**" in this Privacy Policy.
- d. In order to avail the Services, the Users may also be required to upload/share certain documents (for instance, Aadhaar, PAN Card, GST certificate, TAN, MSME, Utility Bill, Shops & Establishment, Certificate of Incorporation, Memorandum of Association, Articles of Association, Partnership Deed, etc.), on the Platform and/or e-mail the same to the Company. Accordingly, the term "**User Information**" shall also include any such documents uploaded or otherwise provided by the Users. We may also keep records of telephone calls received and/or email received and made for making inquiries, orders, or other purposes necessary for the administration of Services.
- e. By using the Platform, You authorize Us to collect, store, process, handle and use such User Information, in accordance with this Privacy Policy and any other terms and conditions of use of the Platform (as amended from time to time) including but not limited to the Terms of Use.

EMIZA SUPPLY CHAIN SERVICES PRIVATE LIMITED

- f. We reserve the right to retain such User Information that forms part of anonymized and aggregated data derived from User Information which may be used for improvement of the Platform, to produce analytical reports, marketing, advertising or such other activities as We may deem fit.
- g. We do not knowingly collect any Personal Information and any Sensitive Personal Information from Persons below the age of 18.
- h. We may in future include other optional requests for information from the User including through User surveys in order to help Us customize the Platform to deliver personalized information to the User and for other purposes as mentioned herein. Such information may also be collected in the course of surveys / contests conducted by Us. Any such additional Personal Information will also be processed in accordance with this Privacy Policy.
- i. **Purposes for which the Company may use the Information:**
 - i. We will retain User Information only to the extent it is necessary to provide one or more Services.
 - ii. By providing your information, You consent to the collection, sharing, disclosure and usage of the information in accordance with this Privacy Policy.
 - iii. The information, which we collect may be utilized for various business and/or regulatory purposes including but not limited for the following purposes:
 - Registration of the User on the Platform;
 - Processing the User's orders / requests and provision of various Services;
 - To provide shipment data to authorities of country in transit and / or destination for customs and tax clearance or for security screening, as required by the laws of such country.
 - Sending timely / periodical updates to the User and its customers;
 - Completing transactions with Users effectively and billing for the products / Services provided;
 - Technical administration and customization of Platform;
 - Ensuring that the Platform content is presented to the Users in an effective manner;
 - Delivery of personalized information and targeted as well as non-targeted advertisements by the Company to the User;
 - Improvement of Services, features and functionality of the Platform;
 - Research and development and for User administration (including conducting user surveys);
 - For purposes of research, analysis, business intelligence, reporting and improvement / development / advancement of the Company's business, Platform and / or the Services;
 - Dealing with requests, enquiries, complaints or disputes and other customer care related activities including those arising out of the Users' request of the Services and all other general administrative and business purposes;
 - Communicate any changes in our Services or this Privacy Policy or the Terms of Use to the Users;
 - Verification of identity of Users and to perform checks to prevent frauds;

EMIZA SUPPLY CHAIN SERVICES PRIVATE LIMITED

- Investigating, enforcing, resolving disputes and applying our Terms of Use and Privacy Policy, either ourselves or through third party service providers;
 - To comply with applicable legal requirements and our various policies/terms; and
- Any other purpose that may be necessary to provide the Services that You have opted for.

5. Cookies

- a. Like most other sites, We use data collection devices known as “cookies” to collect and store information of Users visiting Our Website. A cookie is an alpha-numeric identifier, which is small amount of data file that is sent to a User’s browser from a web server and is eventually stored on a User’s computer hard drive. Cookies are a reliable mechanism to remember the activities of the User on Our Website and help in improving Your experience on Our Website.
- b. We may set and access cookies on Your computer to track and store preferential information about You. We may gather information about You through cookie technology. This anonymous information is maintained distinctly and is not linked to the Personal Information You submit to Us. The option of accepting cookies is up to You, however certain features of Our Website including Content and the forms may not be accessible without accepting cookies. If You choose to eliminate cookies, the full functionality of Our Website may be impaired for You.
- c. Most cookies are session cookies that are automatically deleted from Your device’s hard drive when You close Our Website. Additionally, You may encounter cookies or other similar devices on certain pages of Our Website that are placed by third parties. We do not control the use of cookies by third parties and shall not be liable for any reason whatsoever for these third-party cookies. We use persistent cookies for retaining information about visitors who repeatedly access one of our internet pages.
- d. We may use third party service providers to help Us analyse certain online activities. For example, these service providers may help us measure the performance of Our online campaigns or analyse visitor activity on Our Website. We may permit these service providers to use cookies and other technologies to perform these services for the Company. We do not share any Personal Information with these third-party service providers, and these service providers do not collect such information on Our behalf.
- e. These cookies may be used for:
 - i. offering optimal user guidance as well as to “recognize” you and thus be able to present (as much as possible) diversified internet pages and new contents during repeated use,
 - ii. technical administration of the platform,
 - iii. research and development, and
 - iv. for User administration

6. User Rights

- a. All the information provided to the Company by a User, including Sensitive Personal Data or Information, is voluntary.
- b. **Review:** To ensure the accuracy and adequacy of the Personal Information provided by You, You shall at all times have the option of reviewing the same by requesting Us in the manner as provided under Paragraph 10 of this Privacy Policy.
- c. **Withdrawal of Consent:**

EMIZA SUPPLY CHAIN SERVICES PRIVATE LIMITED

- i. You shall at all times have the option of withdrawing Your consent for the collection, storage and retention of Your Personal Information in accordance with the terms of this Privacy Policy and the Terms of Use.
 - ii. In case of Agents, their right to withdraw consent shall also be subject to the respective agreement.
 - iii. Please note that withdrawal of consent will not be retrospective.
- d. In case the User does not provide his / her information or consent for usage of Personal Information or subsequently withdraws consent for usage of the Personal Information so collected, the Company reserves the right to restrict / revoke access and / or usage of the Platform or discontinue, in part or full, the Services / associated features and benefits for which the said information was sought. Please further refer to Paragraph 11 of this Privacy Policy for the manner of communication with Us.
- e. **Modify:**
 - i. Users can access, modify and correct the Personal Information provided by them which has been voluntarily given by the User and collected by the Company in accordance with this Privacy Policy and Terms of Use.
 - ii. However, if the User updates his / her information, the Company may keep a copy of the information which User originally provided to the Company in its archives for User documented herein.
 - iii. In case the User seeks to update or correct, his / her Personal Information, the User may exercise these rights by emailing the Company at **legal@emizainc.com** and communicate the change(s) for updating the Company's records.
- f. **Account Deletion:** You may choose to delete Your account at any time You like by requesting Us in the manner as provided under Paragraph 11. Please note that it may take up to 180 (One Hundred & Eighty) days to delete all of Your information, like the data stored in our backup systems. However, We may also preserve such information/data as required for legal reasons and as permitted under Applicable Law or to prevent harm.

7. Disclosure and Transfer of User's Information

- a. We do not share Your User Information with any third parties for commercial use or revenue generation. However, subject to Applicable Law, We may share User Information with third party service providers who may be located in India or outside India:
 - i. for enabling services provided by such third party service providers through the Platform;
 - ii. for sending SMS / Email communications to You in relation to the Platform and Our products and services; and
 - iii. to improve and personalize Our products and services. This may involve, for example, activities such as troubleshooting and protection against errors; data analysis and testing; and developing new features.
- b. We ensure that such third-party service providers maintain strict confidentiality (ensuring the same level of confidentiality as maintained by Us) in respect of User Information. Our third-party service providers are required to comply fully with this Privacy Policy.
- c. Further, We reserve the right to utilize, share and/or disclose User Information if:

EMIZA SUPPLY CHAIN SERVICES PRIVATE LIMITED

- i. required to do so to comply with orders of governmental authorities that have jurisdiction over it or as otherwise required by Applicable Law after providing You a written intimation prior to such disclosure; and/or
 - ii. We determine, in Our sole discretion that disclosure of User Information is necessary to identify, contact, or bring legal action against You.
 - d. We may need to disclose / transfer User's Information to Governmental and judicial institutions/authorities, to the extent required:
 - i. Under the laws, rules, and regulations and/or under orders of any relevant judicial or quasi-judicial authority;
 - ii. To protect and defend the rights or property of the Company;
 - iii. To fight fraud and credit risk;
 - iv. To enforce the Company's Terms of Use (to which this Privacy Policy is also a part); or
 - v. When the Company, in its sole discretion, deems it necessary in order to protect its rights or the rights of others.
 - e. The Company may also make all User Information accessible to its employees and data processors / third party vendors only on a need-to-know basis and for the purposes set out in this Privacy Policy.
 - f. The Company takes adequate steps to ensure that all the employees and data processors / third party vendors, who have access to, and are associated with the processing of User Information, respect its confidentiality and that such data processors / third party vendors adopt at least such reasonable level of security practices and procedures as required under applicable law.
 - g. However, the Company does not disclose information, individually labelled or aggregated, obtained through Marketplace Application programming interface on behalf of a User to other Users or any third parties, unless required by law.
 - h. Non-personally identifiable information may be disclosed to third party ad servers, ad agencies, technology vendors and research firms to serve non-targeted advertisements to the Users.
 - i. The Company may also share its aggregate findings (not specific information) in a non-personally identifiable form based on information relating to the User's internet use (to the extent set out in this Privacy Policy) to prospective, investors, strategic partners, sponsors and others in order to help growth of Company's business.
 - j. We may also disclose or transfer the User Information, to another third party as part of reorganization or a sale of the assets or business of Company.
 - k. Any third party to which the Company transfers or sells its assets will have the right to continue to use the Personal Information and/or other information that a User provides to Us in a manner consistent with this Privacy Policy.

8. **Links to Third-Party:**

- a. The links to third-party advertisements, third party websites or any third-party electronic communication services (referred to as "**Third Party Links**") may be provided on the platform which are operated by third parties and are not controlled by, or affiliated to, or associated with the Company, unless expressly specified on the Platform.
- b. If You access any such Third-Party Links, we request You to review the concerned website's privacy policy.
- c. We shall not be responsible for the policies or practices of such third parties.

EMIZA SUPPLY CHAIN SERVICES PRIVATE LIMITED

9. Indemnification

You agree to indemnify, defend and hold harmless Us and Our parent, subsidiaries, affiliates, agents, officers, directors, agents, contractors, licensors, service providers, subcontractors, suppliers, interns and employees, harmless from any claim or demand, including reasonable attorneys' fees, made by any third-party due to or arising out of Your breach of this Privacy Policy or the documents they incorporate by reference (including the respective agreement, where applicable for use of the Platform), or Your violation of any law or the rights of a third party.

10. Security Precautions

- a. For the purpose of providing the Services and for other purposes identified in this Privacy Policy, we are required to collect and host certain data and information of the Users.
- b. We are committed to protecting Your Personal Information, and to that end, the Company adopts reasonable security practices and procedures to implement technical, operational, managerial and physical security control measures in order to protect the Personal Information in its possession from loss, unlawful interception, misuse and unauthorized access, disclosure, alteration and destruction.
- c. We use reasonable secure and technologically appropriate measures, in compliance with the Information Technology Act, 2000 and the rules related thereto to protect You against loss or misuse of Your User Information including internal reviews of data collection, storage and processing practices and other reasonable security measures which are equivalent to security measures that We use to protect Our own confidential information.
- d. *While we try our best to provide security that is commensurate with the industry standards, due to the inherent vulnerabilities of the internet, no internet website or online platform is completely free of security risks, we cannot ensure or warrant complete security of all information that is being transmitted to Us and We do not make any representation in respect of the same.*
- e. The Company takes adequate steps to ensure that third parties to whom the Personal Information may be transferred adopt at least such reasonable level of security practices and procedures as required under applicable law to ensure security of Personal Information.
- f. You hereby acknowledge that the Company is not responsible for any information sent via the internet that has been intercepted beyond Our control after having adopted reasonable security practices and procedures, and You hereby release Us from any and all claims arising out of or related to the use of intercepted information in any unauthorized manner.

11. For how long the Company keeps Personal Information:

- a. Any personal information collected or processed in accordance with this Privacy Policy will be collected by Us, and retained on our behalf either by Us or with Amazon Web Services and / or Microsoft Azure and / or Google Cloud Platform and / or IBM Cloud and/or any other Cloud Services Subscribed by the Company.
- b. Company will retain your Personal Information for as long as needed to fulfil the purpose for which it was collected and for any longer period thereafter in order to comply with applicable law.
- c. In case a User has withdrawn or cancelled their registration from the Platform, we are obliged under law to retain their Personal Information for a period of one hundred and eighty days after such cancellation.

EMIZA SUPPLY CHAIN SERVICES PRIVATE LIMITED

- d. We may retain non-personally identifiable data indefinitely or to the extent allowed by applicable law.

12. **Change in Privacy Policy**

We may update this Privacy Policy from time to time and shall notify you regarding the Policy as well as any such changes periodically and at least once a year. These changes will become effective immediately on posting. We shall not be liable for any failure or negligence on Your part to review the updated Privacy Policy before accessing the Platform. Your continued access to the Platform, following changes to this Privacy Policy, will constitute Your acceptance of those changes.

13. **Contacting Us**

If You have any queries regarding: (i) this Privacy Policy; (ii) information and/or Services available on the Platform, or (iii) Your dealings with Us or believe that We have not adhered to it, You may contact Us at [Mr. <Add Kalim's Full Name>, <Designation>

Emiza Supply Chain Services Pvt Ltd
303, 3rd Floor, Neelkanth Corporate Park,
Vidhyavihar West, Mumbai 400086,
legal@emizainc.com

14. **Email Opt-Out**

You can opt out of receiving Our marketing and update emails. To stop receiving Our promotional emails, please email at [*email address to be inserted by the Client*]. It may take about 30 (thirty) days to process Your request. Please note that Your opting out of getting marketing emails/messages would still enable You to receive transactional messages through email and SMS in relation to Your usage/access of the Platform.