

PRIVACY POLICY

Last updated: 15 Aug, 2024

1. Introduction

Your visit and use of the Website for accessing the information in relation our Business (“**Services**”) are subject to this privacy, security and cookies policy (“**Privacy Policy**”) and other terms and conditions of the Website. This Privacy Policy ensures our firm commitment to your privacy *vis-à-vis* the protection of your information.

In this Privacy Policy “we”, “our” and “us” refers to the Gyroid Photonics Innovations and Technologies Private Limited and its affiliates (“**Company**”) and “you”, “your” and/or “**Users**” refers to the user of the Website.

You must be 18 years of age or older to visit or use the Website in any manner. If you are under the age of 18, you should review this Privacy Policy with your parent or legal guardian to make sure that you and your parent or legal guardian understands and agrees to it and further, if required, you shall perform or undertake such activities which will entitle you to enter into a legally binding agreement with the Company. By visiting this Website or accepting this Privacy Policy, you represent and warrant to the Company that you are 18 years of age or older, and that you have the right, authority and capacity to use the Website and agree to and abide by this Privacy Policy. You also represent and warrant to the Company that you will use this Privacy Policy in a manner consistent with any and all applicable laws and regulations.

This document is published on [●] and was last reviewed¹ and amended on [●]. This Privacy Policy shall be construed in accordance with the provisions of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“**Data Protection Rules**”) under the Information Technology Act, 2000; that require publishing of the Privacy Policy for collection, use, storage and transfer of information. The information collected from you could be categorized as “**Personal Information**”, “**Sensitive Personal Information**” and “**Associated Information**”. Personal Information, Sensitive Personal Information and Associated Information (each as individually defined under the Data Protection Rules) shall collectively be referred to as “**Information**” or “**Personal Information**” or “**Personal Data**” in this Policy

This Privacy Policy is an electronic record in the form of an electronic contract formed under the Information Technology Act, 2000, rules made thereunder, and any other applicable statutes, as amended from time to time. This Privacy Policy does not require any physical, electronic or digital signature.

Please read this Privacy Policy carefully. By using the Website, you indicate, agree and acknowledge that you understand, agree and consent to this Privacy Policy and to the collection and use of information in accordance with this Privacy Policy.

¹ Policy Change Log Table

Sn.	Reviewed and Approved by:	Effective Date of Modified Policy
1.		
2.		

Our Privacy Policy governs your use of the Services on the Website, and explains how we collect, safeguard and disclose information that results from your use of the Service. We reserve the right to amend and supplement to complete this Privacy Policy at any time. Whenever there is a change to our Privacy Policy, we post updates on our Website. We encourage you to regularly review this Privacy Policy to get the latest updates to ensure you know and exercise the right to manage your Personal Information.

Our Terms and Conditions (“**Terms**”) govern all use of our Service and together with the Privacy Policy constitutes your agreement with us (“**Agreement**”).

2. Definitions

Unless otherwise defined elsewhere in this Privacy Policy, the following terms shall have the meanings assigned to them as herein below for the purposes of this Privacy Policy:

“**USAGE DATA**” means information and data collected and captured as a result of the use of Service.

“**COOKIES**” mean small data files stored on your device (computer or mobile device).

“**DATA CONTROLLER**” means a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any Personal Data are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your data.

“**DATA PROCESSORS**” OR “**SERVICE PROVIDERS**” means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

3. Information Collection and Use

3.1 Collection of Data

In order to avail the Services on the Website, account registration may be required by the User. You shall be required to provide various Personal Information at the time of registration. You are fully responsible for all activities that occur under your account. You specifically agree that the Company shall not be responsible for unauthorized access to or alteration of your transmissions or data, any material or data sent or received or not sent or received through the Website. By registering, you consent to provide information including Personal Data.

The Company respects the privacy of the Users and is committed to reasonably protect it in all respects. The information about the user as collected by the Company are:

- Information supplied by Users
- Information automatically tracked while navigation
- Inferred information through usage and log data
- Information collected from any other sources (like third party providers or social media Websites)

In order to provide Services and to maintain and improve the Website, we require certain information (including Personal Data). This information is collected when you express an interest in obtaining information about us or our Services, participate in activities on our Website, or

otherwise contact us. Such Personal Data may be collected in various ways including during the course of your:

- Registering for an event, promotion or a campaign and/or otherwise interact with us;
- Availing Services offered on the Website. Instances of such Services include but are not limited to, communicating with the Company customer service by phone, email or otherwise or posting user reviews in relation to Services;
- Account login information, including any information that is required by User to establish a user account with Company (e.g. login ID/email, user name, password and security question/answer);
- User feedback, including information that User share with Company about their experience in using Company products and services (e.g. your comments and suggestions, testimonials and other feedback related to Company products); and

In order to provide Services and to maintain and improve the Website, we require you to grant certain access right to your phone or other system including but not limited to microphone, camera, location, storage, calendar etc.

3.2 Types of Data Collected

We collect different types of information, including Personal Data, for various purposes to provide and improve our Service for you.

(1) Personal Data

While using our Service, we may ask you to provide us with certain Personal Data i.e. personally identifiable information that can be used to contact or identify you. Personal Data may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, Country, State, Province, ZIP/Postal/Pin code, City
- Other contact information
- Gender and other demographics
- Date of birth and age
- Location Data
- Cookies and Usage Data

(2) Usage Data

We may also collect information that your browser sends whenever you visit our Website and/or use or access the Website by or through any device (“**Usage Data**”).

This Usage Data may include information such as server log, your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages you visit, referring site/webpage, the time and date of your visit, the time spent on those pages, the content that you access on those pages, unique device identifiers and other diagnostic data.

When you access the Website with a device, this Usage Data may include information such as the type of device you use, your device unique ID, the IP address of your device, your device operating system, the type of Internet browser you use, unique device identifiers and other diagnostic data.

(3) Location Data

We may use and store information about your location if you give us permission to do so (“**Location Data**”). We use this data to provide features of our Website, to improve and customize our Website.

(4) Tracking Cookies Data

We may use cookies, web beacons and similar tracking technologies to track the activity on our Website and we may hold certain information. We may use a web beacon (electronic images or also known as clear gifs) to recognize certain types of information on users computer such as time and date of page view, users cookie number, page description.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve our Website.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to access our Website.

3.3 Purpose for Collection and Use of Data

The Company may use the above said user Information to, maintain, protect, and improve the Website . Any Personal Data provided by you will not be considered as sensitive if it is freely available and / or accessible in the public domain like any comments, messages, blogs, scribbles available on social Websites like Facebook, Twitter, Instagram etc

The Company uses the collected data for various purposes including as follows:

- to maintain our Website and enable you to avail/access the Website;
- to notify you about changes to our Website and services ;
- to enable the viewing of content in your interest;
- to provide customer support;
- to analyse information so that we can improve on our Website;
- to notify the necessary information related to the Website and your online account on the Website from time to time, and to contact you to provide the relevant information regarding any events, promotions;
- to monitor your usage of our Website;
- to maintain records and provide you with an efficient, safe and customized experience while using the Website;
- to detect, prevent and address technical issues;
- to furnish your information to Service Providers to the extent necessary for delivering the relevant services;

- aggregated and individual, anonymized and non-anonymized data may periodically be transmitted to Service Providers to help us improve the Website;
- to fulfil any other purpose for which you provide it;
- to verify your identity and prevent fraud or other unauthorized or illegal activity;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- to provide you with notices about your account and/or subscription, including expiration and renewal notices, email-instructions, etc;
- to dispatch transaction-related communications such as welcome letters, billing reminders, and purchase confirmations;
- for general management and reporting purposes, such as invoicing and account management;
- in any other way we may describe when you provide the information;
- to provide aggregate statistics about Users, traffic patterns, and other related information to reputable third parties, however this information when disclosed will be in an aggregate form and does not contain any of personally identifiable information;
- to comply with applicable laws, rules, and regulations; and
- for any other purpose with your consent.

You agree that we may use Personal Information about you or share the same with third party service provider to improve our marketing and promotional efforts, to analyse site usage, improve the Website's content and service offerings, and customise the Websites content, layout, and services. These uses improve the Website and better tailor it to meet your needs, so as to provide you with an efficient, safe and customized experience while using the Website. It is clarified that the third-party service provider shall not have the right with respect to Personal Information and shall use the Personal Information for the limited purpose for which it has been provided or retain the same for purposes of compliance of applicable law or in complete anonymize form for analytical purposes. Such third-party service provider may store the Personal Information in the servers located in India or outside India.

You authorize us to contact you via email or phone call or sms and offer you our services, imparting product knowledge, offer promotional offers running on Application, for which reasons, Personal Information collected may be used. Further, irrespective of the fact that you may have registered yourself under DND or DNC or NCPR service, you still authorize us to give you a call for the above mentioned purposes for a total period of 365 days from the date of you provide details through 'Contact Us'.

3.4 Retention of Data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obligated to retain this data for longer time periods.

Mailing list information, discussion posts and email are kept for only the period of time considered reasonable to facilitate the User's requests.

We reserve the right to retain the aggregated and anonymized data derived from the Personal Data collected from the users of the Website including your Personal Data, for any purposes (commercial and non-commercial) as the Company deems fit and proper.

3.5 Withdrawal of Consent

To the extent possible, we provide you with the option of not divulging any specific information that you wish for us not to collect, store or use. You may also choose not to use a particular service or feature on the Website and opt-out of any non-essential communications from the Website.

You may withdraw your consent given for collecting any Information and Personal Data under this Privacy Policy and pursuant to use/access of our Website, at any time by sending an email to [●]. In such an event, the Company reserves the right to not allow you further usage of the Website.

4. Disclosure of Data

We may disclose the information including Personal Data that we collect, or you provided on our Website as follows:

4.1 Disclosure for Law Enforcement and other legal necessity.

We reserve the right to use or disclose your Personal Data in response to any statutory or legal requirements. We will use and disclose your Personal Data if we believe you will harm the property or our rights or right of the other Users of our Website. Finally, we will use or disclose your Personal Data if we believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person or property, violations of the Website's other policies, or as otherwise required by law when responding to subpoenas, court orders and other legal processes.

We reserve the right to use or disclose your Personal Data and other information if we believe that disclosure is necessary or appropriate to protect rights, property and safety of the Company, its users, customers, Service Providers, officers and shareholders. We may also in good faith share information with other organizations and entities for the purposes of fraud protection and credit risk reduction.

4.2 Business Transaction

If we or our group entities are involved in a merger, acquisition or asset sale, and/or in the event the ownership or control of our Website changes, we may transfer your information to the new owner.

4.3 Disclosure by the User

Please keep in mind that if you disclose Personal Information in posting as comments, messages, files, photos on the discussion forums or blogs on the Website, such information may become publicly available.

4.4 Other Disclosures

We may also disclose your Personal Data as follows:

- to our subsidiaries and affiliates;
- to contractors, Service Providers, and other third parties we use to support our business in compliance with the provisions of this Privacy Policy;
- to fulfil the purpose for which you provide it;
- for the purpose of including your institution / company's logo on our website;
- for any other purpose disclosed by us when you provide the information; and
- with your consent in any other cases.

4.5 Data Processing by the Service Providers

We may engage and employ third party companies and individuals to perform certain processing activities and to perform Service ("**Service Providers**"), to provide Service on our behalf, perform Service-related activities or assist us in analysing how our Service is used. Towards that objective, we may share your Personal Information with such Service Providers.

The Service Providers may be engaged and employed for various purposes including following:

- Analytics: We may use Service Providers to monitor and analyze the use of our Service and the Usage Data.
- CI/CD tools: We may use Service Providers to update and automate the development process of our Website.
- Behavioural Remarketing

We may use marketing services to advertise on third party websites to you after you visited our Website. We and our Service Provider use cookies to inform, optimise and serve ads based on your past visits to our Website.

5. Data Security Practice and Procedure

The security of your data is important to us, but remember that, no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

5.1 Security of Data

We maintain strong security safeguards to ensure the security and confidentiality of the User's data, protect against any anticipated threats to the security of your Personal Information, protect against unauthorized access to your information, and ensure the proper disposal of your Personal Information. We have adopted a comprehensive security policy that complies with laws and regulations and reflects industry standards. We have in place appropriate safeguards and security measures to protect the personal data you provide on this Website against accidental or any other unlawful forms of processing. We use third party Service Providers for the purposes of payment collections and information shared by you in relation to payments, shall be governed by privacy policy adopted by such Service Providers.

Our security policy requires us to consistently monitor the risk of any threats to the administrative, technical, and physical safeguards we have put in place to protect your information. The safeguards include, at a minimum, firewalls and data encryption and restricting access to your Personal

Information only to those employees who have a need to know such information to carry on our operations. These safeguards are reviewed and adjusted periodically based on ongoing risk assessments.

5.2 Grievance Officer

In accordance with Information Technology Act 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 made there under, the name and contact details of the Grievance Officer are provided below:

The Grievance Officer

Name: Mr. Siva Umopathy

Gyroid Photonics Innovations and Technologies Private Limited Address: B604, 6th Floor, Whispering Meadows, Next to Pebble Bay, RMV 2nd Stg, Nagashetty Halli, Bangalore, Bangalore, Karnataka, India, 560094, Karnataka, India

Email: uma@gyrophint.com/ director@gyrophint.com

5.3 Transfer of Data

The information, including Personal Data, we obtain from or about you may be maintained, processed and stored by us on the systems situated in the territory of Republic of India.

However, subject to applicable laws, your information, including Personal Data, may be transferred to – and maintained on – computers located in the countries other than India where the data protection laws may differ from those of the Data Protection Rules applicable in India.

If you are located outside India and choose to provide information to us, please note that we transfer the data, including Personal Data, to India and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The Company will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other Personal Information.

We comply with generally accepted industry standard regulations regarding the collection, use, and retention of data under the Information Technology Act, 2000 and Data Protection Rules. By using the Website, you consent to the collection, transfer, use, storage and disclosure of your information as described in this Privacy Policy, including to the transfer of your information outside of your country of residence.

6. Links to Other Sites

Our Website may contain links to third party websites and mobile applications that are not operated by us. If you click such link, you may be directed to such third party's websites and mobile applications. We strongly advise you to review the Privacy Policy of every site you visit.

We may also use APIs, tools and other services of third party for offering our services to the Users.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party websites and mobile applications or any services offered by such third parties. You agree that we shall not be liable for any breach of your privacy of Personal Information or loss incurred by your use of such websites or services.

7. Changes to this Privacy Policy

This Privacy Policy will remain in effect except with respect to any changes in its provisions in the future. We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you are advised to review this Privacy Policy periodically for any changes. Your continued use of the Website after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

We may let you know via email and/or a prominent notice on our Website, prior to the material change becoming effective and update “effective date” at the top of this Privacy Policy.

8. Contact Us

If you have any questions about this Privacy Policy, please contact us by email: director@gyrophint.com