



## BACKGROUND

AutomataPi Solutions Pvt. Ltd. (the “Company”), including its subsidiaries and affiliates (collectively, “**we**,” or “**us**”) respects the privacy of its customers, business partners, event attendees, job applicants, Website (as defined below) visitors and SaaS platform Users.

The following Privacy Policy explains who we are and the different ways in which we collect, use, and share personal information about you, and how you can exercise your privacy rights. Please take the time to read this Privacy Policy and the related statements in their entirety to ensure you are fully informed.

If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided at the bottom of this Privacy Policy.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our **Site and SaaS platform**. If you do not accept and agree with this Privacy Policy, you must stop using **our Site and SaaS platform** immediately.

## WHAT DOES THIS POLICY COVER?

**Privacy Policy.** Our Privacy Policy covers our privacy practices with respect to the collection, use, and disclosure of information obtained through: (i) the [www.automatapi.com](http://www.automatapi.com) website that links to this Privacy Policy (our “**Website**”); (ii) events hosted by Us or our business partners and sponsors where we collect information from attendees (“**Events**”); and (iii) our SaaS platform (“**Platform**”) This Privacy Policy applies only to your use of **our Website and Platform**. They may contain links to other websites. Please note that **we** have no control over how your data is collected, stored, or used by other websites and **we** advise you to check the privacy policies of any such websites before providing any data to them.

## **PURPOSE**

Automatapi.com, including its subsidiaries and affiliates (collectively, "we," or "us") respects the privacy of its Website (as defined below), Platform (as defined below) and Events (as defined below) registrants and attendees.

This Privacy Policy (the "Privacy Policy ") describes who we are, the information that we collect about you, how we obtain your personal information, and how we may use or disclose that information in connection with the Website and Events. This Privacy Statement also describes the measures we take to protect the security of your personal information and how you can contact us about our privacy practices, including to exercise your privacy rights.

## **WHAT IS PERSONAL DATA?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## **HOW WE OBTAIN INFORMATION?**

As further described below, we collect several types of information from and about you that broadly falls into the following categories:

### *1. Information you voluntarily provide to us:*

When filling out forms on our Website and/or Platform (including without limitation, name, mailing address, email address, and telephone number).

When you post material to our Website and/or Platform, participate in bulletin boards, chat rooms, blogs, comment threads, forums, or other interactive features of our Website, register, or request further information or services from us.

When you register to use a demo or developer instance of our cloud service.

When you enter a contest or promotion we sponsor.

When you report a problem with our Website and/or Platform.

When you contact us.

When you complete our surveys.

When you register for or attend an Event.

Other information you may submit to us related to your use of our Website and/or Platform or attendance to an Event, including without limitation, billing information.

## *2. Information from third parties.*

From time to time, we may collect and use information we receive about you from third parties in connection with your use of the Website and/or Platform or attendance to an Event. For instance, we may receive information about you from our business partners related to your registration information for Events. We also use third parties for reporting and analytics to measure the effectiveness of our Website and/or Platform and marketing efforts, and to identify areas for improvement.

We may combine information we collect from third parties with information you provide us to update, expand or provide you with tailored information regarding our products, services and Events.

## *3. Information we collect as you navigate through the Website and/or Platform.*

As you navigate through the Website and/or Platform, we may also automatically collect

details about your visits Website and/or Platform, including your IP address, usage patterns, traffic data, location data, logs and other communication data and the resources that you access, as well as information about your computer and internet connection, including your operating system and browser type.

We do not use Cookies or similar tracking technologies. For detailed information, please see our Cookies Policy.

### **How We Use Information Collected?**

We may use information that we collect about you for the following purposes:

To operate, maintain and improve Website and/or Platform.

To register you for Events you sign up for with us and populate profiles for you in our records.

To provide you with information, products or services that you request from us.

To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including without limitation, our Website and/or Platform Terms & Conditions.

To notify you about changes to our Website and/or Platform or obtain any required consent.

To allow you to participate in interactive features of our Website and/or Platform, when you choose to do so.

For industry analysis, benchmarking, analytics, marketing, and other business purposes.

To track your browsing behaviour, such as the pages you visited over time, for analytics and advertising purposes.

To communicate with you about Events With your permission and/or where permitted by law, **we** may also use your personal data for marketing purposes, which may include contacting you by email **AND/OR** telephone **AND/OR** text message **AND/OR** post with

information, news, and offers on our **OR** products **AND/OR** services. You will not be sent any unlawful marketing or spam. **We** will always work to fully protect your rights and comply with **our** obligations under the GDPR and the Information Technology Act, 2000 and you will always have the opportunity to opt-out. If you ask us to contact you about goods and services, we may use your personal information or permit selected third parties to use your personal information to contact you about such goods and services. You can withdraw consent at a later time by clicking on the “unsubscribe” link located in the emails we send you. For more information, see the section on “**Your Privacy Rights**” below.

Additional information about our privacy practices with respect to our collection and use of information from Events may be found in additional privacy statements on the registration sites for Events hosted by us.

- 1.1 Both Users and Us shall comply with all requirements of the *Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011*. With respect to personal data hosted by Us on behalf of a User, for the purposes of the Information Technology Rules, 2011 the User is the data controller and We are the data processor.
- 1.2 You must ensure that, with respect to your User Site(s) and any and all User Content, you have all necessary and appropriate consents and notices in place in order to enable the lawful transfer of personal data to Us for hosting.
- 1.3 Any and all personal data processed by Us (as a data processor) on your behalf (as a data controller) in the course of providing our Platform and hosting your User Site(s) shall be processed in accordance with the terms of *Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011*.

## How We Share Information Collected

We may disclose personal information that you provide to us to the following categories of recipients:

To our *subsidiaries and affiliates* (including those located outside the European Economic Area) who will use it only for the purposes described in this Privacy Statement.

To our *contractors, business partners and service providers* we use to support our business or who provide services on our behalf. For clarity, [automatapi.com](https://www.automatapi.com) does not share Event attendee data with business partners or sponsors unless you opt in to such sharing via an Event registration form or you attend an Event hosted by [automatapi.com](https://www.automatapi.com). If you do not wish for your information to be shared with our business partners or sponsors, you may choose not to opt in via the event registration forms. If you choose to share your information with business partners or sponsors, your information will be subject to the respective business partner or sponsor's privacy statement.

To a *potential buyer* (and its agents and advisors) in connection with any proposed merger, acquisition, or any form of sale or transfer of some or all of our assets (including in the event of a reorganization, dissolution or liquidation), in which case personal information held by us about you will be among the assets transferred to the buyer or acquirer.

To *any competent law enforcement body, regulatory, government agency, court or other third party* to: (i) comply with any court order, a request from any competent law enforcement agency, or any other legal obligation; (ii) enforce or apply our Website and/or Platform Terms & Conditions or terms of any other agreement; (iii) and protect the rights, property, or safety of the host/Website and/or Platform .

To any *other person with your consent* to the disclosure.

We do not sell, rent or trade information collected through the Website and/or Platform with third parties for their promotional purposes.

### **Legal Basis for Processing**

If you are from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided in the "Contact Information" section below.

### **Security and Confidentiality**

The Company maintains appropriate technical and organizational measures to protect the personal information obtained through the Website and/or Platform and in connection with Events from accidental or unlawful destruction, loss, alteration, unauthorized disclosure and access. AutomataPi personnel and service providers with access to personal information collected through our Website and/or Platforms or from Event attendees are required to keep such information confidential and secure.

### **Retention**

Our data retention policies and procedures are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data. Personal data that we process for any purpose or purposes shall not be kept for longer than 3 years.

In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on reasonable requirement basis. We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact us through the information provided below in clause pertaining to “Contact Us.”

#### **WHERE DO YOU STORE MY PERSONAL DATA?**

All the User Personal Data collected are stored by the Company and/or the Company’s clients on whose behalf the data has been collected. In the event of any dispute pertaining to violation of the personal data or violation of the GDPR, the Company and/or the Company’s clients shall be responsible.

#### **YOUR PRIVACY RIGHTS**

Under the GDPR, you have the following rights, which **we** will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact **us** to find out more or to ask any questions using the details in Clause “Contact Us” stated below.
- b) The right to access the personal data **we** hold about you. Clause pertaining to “**how to access your personal data**” stated below will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by **us** is inaccurate or incomplete. Please contact **us** using the details in Clause “Contact Us”



stated below

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Clause “Contact Us” stated below.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

#### **WHAT DATA DO YOU COLLECT?**

Depending upon your use of Our Site and/or Platform we may collect some or all of the following personal and non-personal data including but not limited to:

[Name;]

[Date of birth;]

[Gender;]

[Address;]

[Email address;]

[Telephone number;]

[Business name;]

[Job title;]

[Profession;]

[Payment information;]

[Information about your preferences and interests;]

[IP address];

[Web browser type and version;]

[Operating system;]

## DO YOU SHARE MY PERSONAL DATA?

- i. We will not share any of your personal data with any third parties for any purposes, subject to one important exception. In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority. However, it is to be noted that section 69 of the Act, which is an exception to the general rule of maintenance of privacy and secrecy of the information, provides that where the Government is satisfied that it is necessary in the interest of:

the sovereignty or integrity of India,

defence of India,

security of the State,

friendly relations with foreign States or

public order or

for preventing incitement to the commission of any cognizable offence relating to above or

for investigation of any offence,

- ii. It may by order, direct any agency of the appropriate Government to intercept, monitor or decrypt or cause to be intercepted or monitored or decrypted any information generated, transmitted, received or stored in any computer resource. This section empowers the Government to intercept, monitor or decrypt any information including *information of personal nature* in any computer resource.

- iii. Where the information is such that it ought to be divulged in public interest, the Government may require disclosure of such information. Information relating to anti-national activities which are against national security, breaches of the law or statutory duty or fraud may come under this category.

#### HOW CAN I ACCESS MY PERSONAL DATA?

- i. If you want to know what personal data **we** have about you, you can ask **us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.
- ii. All subject access requests should be made in writing and sent to the email or postal addresses shared under Clause “Contact Information.”.
- iii. There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover **our** administrative costs in responding.
- iv. **We** will respond to your subject access request within **15 working days** and, in any case, not more than one month of receiving it. Normally, **we** aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date **[we] OR [I]** receive your request. You will be kept fully informed of **our** progress.

#### GENERAL

##### DO NOT TRACK

While the Company attempts to honour do not track (“DNT”) instructions we receive from a Visitor’s browser, we cannot guarantee that we will always respond to such signals, in part, because of the lack of common industry standard for DNT technology. We continue to

monitor developments in DNT technology and stay apprised of DNT industry standards as they evolve.

### **THIRD PARTY WEBSITES AND APPLICATIONS**

This Website and/or Platform may link to websites that are not owned or controlled by Us. As such, this Privacy Statement does not apply to information collected on any third-party site or by any third-party application that may link to or be accessible from the Website and/or Platform. This Privacy Policy does not apply to information collected by customers, our business partners, and other third parties or third-party applications or services, even if this information is collected using our Website and/or Platform or at Events.

### **PUBLIC FORUMS AND BLOGS**

Please note that any information you post or disclose in public forums will become public information, and may be available to users and the general public. We urge you to be very careful when deciding to disclose your personal information, or any other information in our public forums. Proper access and use of information provided on the Website and/or Platform, including contributions to our public forums, is governed by our Website and/or Platform Terms of Use and known or suspected violations should be reported to our Privacy team via e-mail at [policy@automatapi.com](mailto:policy@automatapi.com).

### **CHILDREN**

We do not knowingly collect personal information from anyone under the age of 18. If you are under 18, please do not attempt to fill out our forms or send any personal information about yourself to us. If we learn that we have collected Personal Information from a child under age 18, we will delete that information promptly.

### **CHANGES TO OUR PRIVACY STATEMENT**

The Company reserves the right to update or change this Privacy Policy from time to time. If we make material changes to this Privacy Policy, we will notify you through an appropriate online notice or other means (which may include, if we have your contact details, notification by e-mail) and obtain your consent if and where required by applicable law. We ask that you review the Privacy Policy periodically to stay informed about any updates or changes that we may have made.

You can see when this Privacy Policy was last updated by checking the “effective as of” date displayed at the top of this Privacy Statement.

#### **CONTACT INFORMATION**

To ask questions or comment about this Privacy Policy and our privacy practices or if you need to update, change or remove your information or exercise any other rights, contact us at:

E-mail            [policy@automatapi.com](mailto:policy@automatapi.com)

Address            1001 Jai Antariksh, Makwana Road, Marol, Andheri East, Mumbai 400059

#### **CHANGES TO THIS PRIVACY POLICY**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.