



PRIVACY AND SECURITY POLICY

This policy describes:

- the types of information that kristalball may collect from you when you access or use its websites (www.kristalball.in), mobile applications (kristalball, and/ or such other as may be added from time to time), other applications, and other online services (collectively, referred as “Services”); and
- its practices for collecting, using, maintaining, protecting and disclosing that information.

Background

1. kristalball Smart Solutions Pvt Ltd and/or its affiliates (“kristalball,” the “Company,” “we,” “us,” and “our,”) respect your privacy and is committed to protecting it through its compliance with this privacy policy (“Privacy Policy”). This Privacy Policy describes:

- i. the types of information (“Data” detailed below in clause 2) that kristalball may collect from you when you access or use our website at ‘www.kristalball.in’ (‘Website’), Services, social media platforms, etc.;
- ii. kristalball’s practices for using, storing, protecting and disclosing Data; and
- iii. your choices regarding use, access and correction of your personal information.

This Privacy Policy governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information. If you do not agree with the data practices described in this Privacy Policy, you should not use the Services.

2. By using the Website and/ or the Services, you consent to the use of Data as specified in this Privacy Policy. This policy applies to anyone who is using the Website and/ or the Services and/ or uploading or submitting any Data, irrespective of whether the Data belongs to that person or any other person or organization and irrespective of whether the Data is identified in writing as confidential or may be reasonably understood to be confidential due to the nature of information. If you do not agree with the terms and conditions of this Privacy Policy, we will request you to discontinue using the Website and/ or the Services. By accessing or using the Website and/ or the Services, you agree to this privacy policy and you are consenting to kristalball’s collection, use, disclosure, retention, and protection of your personal information as described here.

2.1 This Privacy Policy applies to the Website and/ or the Services. Please read this Privacy Policy carefully. We may from time to time update this Privacy Policy. Any changes to this Privacy Policy will become effective when we post or link to the revised Privacy Policy on the Website and/ or the Services.

2.2. By using the Website and/ or the Services and agreeing to the terms and conditions, you confirm that You have read this Privacy Policy as available on the Website and/ or the Services, you have the right to submit such information and give us your consent to the receipt and use of the Data in the manner stated in this Privacy Policy. You also represent that if you upload personal data or information of any third party such as employees, consultants, agents, you will take due prior written authorization/ consent from such third party to the submission of such personal data or information (including sensitive personal data or information) on the Website and/ or the Services and its use by us in the manner stated in this Privacy Policy. Neither we, nor any other person or organization will be responsible for any failure on your part to comply with such requirement and You will be solely responsible for the consequences.

3. What data we collect:

3.1 When you access and/ or use the Website and/ or the Services, we collect the following Data:

3.1.1 Your Personal Information. ‘Personal Information’ is the information that can be associated with a specific person and could be used to identify that specific person whether from that data, or from the data and other information that we have or is likely to have access to and may include information such as your full name, age, email ID, company name, contact number and location. We do not consider personal information to include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise.

3.1.2. Information about your internet connection and provider, IP address, the equipment/devices you use to access our Website and/ or the Services and your usage details.

3.2 How we collect the Data:

3.2.1. automatically as you navigate through our Website and/ or the Services (information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies).

3.2.2. directly from you when you provide it to us while filling and submitting any forms, requesting any information, sending emails, interacting with chatbots and other any similar mechanism.

3.3 Where do we store the Data?

3.3.1. Any Data submitted/ uploaded by you on the Website and/ or the Services or collected by us is stored in our / Third Party Vendor’s servers.

3.4 Information from Third Parties

We may collect, process and store your user ID associated with any social media account (such as your twitter and LinkedIn) that you use to access or sign into the Website and/ or Services. When you access or sign in to your account with your social media account information, or otherwise connect your social media account with the Website and/ or Services, you consent to our collection, storage, and use, in accordance with this Privacy Policy, of the information that you make available to us through the social media interface. This could include, without limitation, any information that you have made public through your social media account, information that the social media service shares with us, or information that is disclosed during the sign-in process. Please see your social media provider’s privacy policy and help center for more information about how they share information when you choose to connect your account.

We may also obtain information about you from third parties such as partners, marketers, third-party websites, and researchers, and combine that information with information which we collect from or about you.

3.5 Anonymous or De-Identified Data

We may anonymize and/ or de-identify information collected from you through the Website and/ or Services, including via the use of third-party web analytic tools as described below. As a result, our use and disclosure of aggregated and/ or de-identified information is not



restricted by this Privacy Policy, and it may be used and disclosed to others without limitation.

4. How We Use the Information We Collect

4.1. The Data that we take from You may be used for the following purposes:

- i. Process and respond to your queries;
- ii. Improve your experience by personalizing the Website and/ or Service;
- iii. Understand our users, improve the content (such as by personalizing content to your interests), and make special offers.
- iv. Send information or content to you which we think may be of interest to you by email or other means and send you marketing communications relating to our business;
- v. Promote use of our Services to you and share promotional and information content with you in accordance with your communication preferences;
- vi. Send information to you regarding changes to this Privacy Policy, or any other legal agreements or requirements
- vii. Diagnose technical problems.
- viii. Enable us to show you ads that are relevant to you.
- ix. Generate and review reports and data about, and to conduct research on, our user base.
- x. Administer contests and sweepstakes.
- xi. Notify you about changes to our products, solutions and services.
- xii. Allow you to participate in interactive features offered through our Website and/ or Services.
- xiii. For any other purpose with Your prior consent.

4.2. We may use the Data we have collected from you to enable us to display advertisements to our advertisers'/service providers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

4.3. General Information Disclosures – We may disclose the Data in the following situations:

- i. To our subsidiaries and affiliates, which are entities under common ownership or control of our ultimate parent company kristalball.
- ii. To contractors, advertisers, service providers and other third-parties whom we engage to support our business and who are bound by contractual obligations to keep Data confidential and use it only for the purposes for which we disclose it to them.
- iii. To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Data from our Website are among the assets being transferred.
- iv. For the purposes specified in clause 3.1 above.
- v. With outside vendors that we use for a variety of purposes, such as to study your visits, usage and behaviour on the Website or to send you communications via emails, messages or tele-call to inform you about our products that may be of interest to you, push notifications to your mobile device on our behalf, provide voice recognition services to process your spoken queries and questions. We also may use vendors for other projects, such as conducting surveys or

organizing sweepstakes for us. We may share information about you with these vendors only to enable them to perform their services.

- vi. When we believe in good faith that sharing of your Data is reasonably necessary in order to investigate, prevent, or take action regarding possible illegal activities or to comply with legal process. We may also share your information to investigate and address threats or potential threats to the physical safety of any person, to investigate and address violations of this Privacy Policy, or to investigate and address violations of the rights of third parties and/or to protect the rights, property and safety of kristalball, our employees, users, or the public. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organizations on account of legal request such as subpoena, court order or government demand to comply with the law as specified in subsequent clause.
- vii. If you interact with social media features on our Website, such as the Facebook Like button, or use your social media credentials to log-in or post content, these features may collect information about your use of the Website, as well as post information about your activities on the social media service. Your interactions with social media companies are governed by their privacy policies.
- viii. We may share your information in any other circumstances where we have your prior consent.

4.4. We will never deal in or use your Data for any purposes other than as set out in this Privacy Policy.

4.5. We own all rights to the Website and/ or the Services, you retain all rights to the Data provided by You.

4.6. We may disclose Data to unaffiliated third parties if we believe in good faith that such disclosure is necessary (i) pursuant to law, regulatory requirements or the order of any court or governmental authority or (ii) in order to comply with or avoid violation of any request by a regulatory authority. kristalball shall, however, give prompt notice to you of such order so that you may (1) interpose an objection to such disclosure, (2) take action to assure confidential handling of the Data or (3) take such other action as it deems appropriate to protect the Data, unless prohibited by law from doing so. The Data submitted by you may be shared, without obtaining your prior consent, with Government agencies mandated under the law to obtain such information including sensitive personal data or information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, if the Government agency shall send a request in writing to us stating clearly the purpose of seeking such information and states that the information so obtained shall not be published or shared with any other person.

5. Security of Data

5.1. Any Data submitted by you through the Website and/ or Services shall be kept on secure servers of our/ Third Party Vendors. We ensure from time to time that the servers on which Data is stored is kept in a controlled environment with limited access.

5.2. kristalball and the Third Party Vendors have implemented technical, physical and organizational measures to ensure the security, integrity, availability and confidentiality of



Data in order to prevent, among other things, accidental, unauthorized or unlawful processing of Data. The security measures taken are in compliance with applicable data protection regulations and shall be adapted to consider a) the risks presented, b) nature of the Data to be processed, and c) the cost of implementation.

5.3. While we make reasonable efforts to protect and safeguard your Data, we do not make any representation that the Website is impenetrable from security attacks and threats.

6. Your Consent

6.1. By accessing our Website and/ or Services, you are consenting to our collecting, storing, sharing and processing of the Data as per the terms and conditions stated herein.

6.2. You may, after giving your consent to receive and process your Data and information on the Website and/ or Services, withdraw such consent at a subsequent stage. Any such withdrawal of consent from You shall need to be sent in writing to our grievance Officer at the details mentioned in clause 8 below. If you choose not to provide Data or subsequently withdraw your consent, we may not be able to provide you access to the Website. Withdrawing your consent will neither affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Data conducted in reliance on lawful processing grounds other than consent nor will it affect any statutory requirement on Us to retain such Data post withdrawal of your consent.

6.3. You may unsubscribe from our marketing communications by sending us email us at hello@kristalball.com.

7. Accuracy of Data and Correction

You shall be permitted, as and when requested by you, to review the Data which you had provided. If you find any inaccuracy or deficiency, you may ask for corrections to be made and we will try to accommodate your request to the extent feasible. We shall at no point in time be responsible for any inaccurate information provided by You.

8. Name and Address of the Entity Collecting and Retaining Your Information

Name and address of the entity collecting and retaining your Data shall be the as stated below:

Name and address of the entity collecting your Data – kristalball Smart Solutions Pvt Ltd.

Name and address of the entity hosting the servers having the Data AWS.

9. Data Security and Grievance Officer

kristalball has a common role for the Data Security Officer and Grievance Officer (“Data Security Officer and Grievance Officer”). The name and contact details of the grievance officer (“Grievance Officer”) are specified below for redressing your grievances regarding Data. You have the right to contact the Data Security Officer and Grievance Officer for any questions or complaints about our collection and use of your Data.

The Data Security Officer and Grievance Officer shall redress the grievances of provider of information expeditiously in accordance with laws applicable at the time of receipt of the grievance by us.

Data Security and Grievance Officer Details: Atharva Telange (emails: Atharva.Telange@kristalball.com).

10. Transfer of Data

Some of the uses and disclosures mentioned in this Privacy Policy may involve the transfer of your Data within as well as outside India from one server to another, solely for the purpose of hosting and/or storage. It should be noted in this connection that different jurisdictions may have different requirements of privacy of Data. We will ensure that the jurisdiction where Data gets transferred requires atleast the same level of data protection as applicable to India. Data will be transferred only if it is necessary for the performance of our lawful obligations towards you.

11. Modifications to this Privacy Policy

If we decide to change this Privacy Policy, we will post the changes on this page so that you are always aware of how we use your Data and under what circumstances it can be disclosed. Any changes to the Privacy Policy will be communicated in advance of implementation.

12. Questions Regarding this Privacy Policy

If you have questions regarding this privacy policy, please contact us at hello@kristalball.com.

13. Retention of Data

Data shall be retained only upto the time as required to carry out the activities mentioned in this Privacy Policy after which we shall purge any such the Data from all computer and other data storage systems within the statutory period; provided, however, that we shall not be required to purge any Data that it is required to retain pursuant to law or regulatory requirements.