

PRIVACY POLICY

This Privacy Policy is published in compliance of:

- (i) Section 43A of 'The Information Technology Act, 2000';
- (ii) Rule 4 of 'The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011' (hereinafter referred to as the "**SPI Rules**");
- (iii) Relevant Provisions of 'The Consumer Protection Act, 2019' read with 'The Consumer Protection (E-Commerce) Rules, 2020'

1. DEFINITION

*[User(s) are requested to refer/rely upon the definition clause incorporated in the another document named as 'Terms of Use' available in our Website(s) of **WATTKART** reference to all or any terms which are not defined hereinafter]*

- (i) "**User ID**": It is an identification which is assigned with a unique, random number as a user identification to each individual User(s) through its computer/mobile devices by way of using "cookies", or similar other electronic tools in order to improve the responsiveness for our User(s) and their individual interests may be identified.

2. INTRODUCTION

WATTKART is a customer centric web-based platform which facilitates the end user in holistic management which includes but is not limited to procurement, supply, Servicing etc. of their Power Plants, and management of their industrial operations in an efficient manner. Its online platform is one stop solution for suppliers, service providers, OEM, Non-OEM, Power Plant O&M team, Industrial customer to collaborate and trade with each other in a simple, fast and efficient manner from across the country. While serving the users, we ensure to consider your privacy of utmost importance and keep the same fully protected and safe. In order to ensure that we deliver our commitment, keep transparent processes to deal with and about the data we collect from our User(s) and how it is used and, we further ensure that it is never shared with any third parties with or without our conscious efforts.

This Privacy Policy shall apply to all our User(s) who visit and access our Website. User(s) herein unconditionally agree that browsing our Website or buying any product(s) on it signifies their unconditional assent to this Privacy Policy and the Terms of Use published herein.

We respect the privacy of our User(s) and, committed to protect it in all respects. Any dispute with us over any privacy matters are subject to this Privacy Policy read in conjunction with the 'Terms of Use' published on our Website: www.wattkart.com .

By accessing and/or using the Website(s), the Users signify their agreement to accept this Privacy Policy.

IF YOU DO NOT AGREE WITH ANY OR ALL OF THE FOLLOWING TERMS OF THE PRIVACY POLICY, PLEASE DO NOT ACCESS AND/OR USE THE WEBSITE(S).

3. PERSONAL INFORMATION

"Personal Information" is defined under the SPI Rules to mean any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

The SPI Rules further define "sensitive personal data or information" (hereinafter referred to as the "SPDI") of a person to mean Personal Information about that person relating to:

- (i) passwords;
- (ii) financial information such as bank accounts, credit and debit card details or other payment instrument details;
- (iii) physical, physiological and mental health condition;
- (iv) name, age, address, e-mail, phone number, date of birth
- (v) information received by body corporate under lawful contract or otherwise;
- (vi) visitor details as provided at the time of registration or thereafter; and

All the aforementioned information is collectively referred to as "Personal Information."

The information about the Users, as collected by us from the Website(s) of WATTKART, is given as below:

- a) information supplied by the users and
- b) information automatically tracked while navigation (Information).

By accessing/using our Website of **WATTKART** and/or its services by the User(s), he/she voluntarily and unconditionally gives his/her consent to collection, storage, and/or use of the Personal Information provided by him/her, including any other changes thereto as provided by him/her at any later stage, for availing any kind of the services that We offer.

To avail certain services on our Website(s)/Mobile Application(s) of WATTKART, the User(s) may be required to provide certain information for the registration process that may include but not limited to :-

- a) Your name,
- b) email address,
- c) sex,
- d) age,

- e) PIN code,
- f) credit card or debit card details,
- g) password etc., and/or your occupation, interests, and the like.

We presume adequate and lawful parental consent in case the Personal Information is shared by any user under the age of 18 (eighteen) years.

The information as supplied by the User(s) enables us to improve our website of WATTKART and provide back to the User(s) the most user-friendly experience.

It is clarified that any information shall not be considered as sensitive in case it is freely available and accessible in the public domain or is furnished under the Right to Information Act, 2005 and any rules made thereunder or, any other law for the time being in force.

The primary reason for gathering information is to improve our products, deals, services, website content and navigation.

4. REASONABLE SECURITY PRACTICES AS PER THE INFORMATION TECHNOLOGY ACT, 2000 AND ITS RULES

We have implemented reasonable security practices as per Rule 8 of the SPI Rules as mentioned above and the Information Technology Act, 2000 amended through the Information Technology Amendment Act, 2008.

We have implemented acceptable standards of technology, managerial security, technical security, operational security and physical security in order to protect your personally identifiable information from loss, misuse, disclosure, alteration or destruction. We have been assured by the third-party cloud service providers that the data collected by us are managed and stored firmly and securely as per the globally accepted best practices.

We have implemented "Reasonable Security Practices" as required by the Information Technology Act, 2000 and the SPI Rules. By complying with such provisions, we assure our User(s) proper care and control over our I.T. and Security operations as required under relevant sections i.e. sections 43, 43A, 45, 66, 72A & 85 of the Information Technology Act, 2000 read with the Information Technology Amendment Act, 2008 and including related rules made therein. However, we (whether directly or indirectly) shall not be held responsible for any fraudulent/criminal activity in regard to misuse or unauthorized use of your sensitive personal information stored in our Website of WATTKART.

By accessing/using our Website of WATTKART, User(s) agree that we shall not be held responsible for any uncontrollable security attacks and any consequential losses (whether directly or indirectly) including financial losses, loss of opportunity, legal cost, attorney's fees, business losses, reputation loss, direct and indirect losses that may occur to the User(s), as per the statutory provisions of Section 43, 43A and 45 of the Information

Technology Act, 2000 including any amendments in the said Act and any other laws of India for the time being in force.

You further agree that our management shall not be held responsible directly or indirectly for any cyber-crime related criminal liabilities under the Information Technology Act, 2000/2008 relating to your information, as you have agreed and acknowledged that our management complies with due diligence (care & controls) requirements of the Information Technology Act, 2000 including its rules and amendments.

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data.

All information gathered on our Website of **WATTKART** is securely stored and managed by us on third party cloud service provider's server as mentioned earlier. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the internet. In any case, we take all reasonable efforts that any personal information provided by you to us is transmitted through modern cryptography (secure HTTPS connection).

However, the internet is an ever evolving medium. We may change our Privacy Policy from time to time to incorporate in lieu of necessary future changes and/or to comply with amendment in the existing laws, including but not limited to cover other technical upgradation (if any) that may come from time to time. Of course, our use of any information we gather will always be consistent with the policy under which the information was collected, regardless of what the new policy may be, provided that the same is not also contrary to the existing laws at the relevant time in future.

5. COOKIES

To improve the responsiveness for our User(s), we may use "cookies", or similar other electronic tools to collect information in order to assign each user a unique, random number as a user identification ("**User ID**") to understand each and every user's individual interests using their identified computer/mobile devices. Unless you voluntarily identify yourself (through registration, for example), we will have no way of knowing who you are, even if we assign a cookie to your computer/mobile devices. A cookie also cannot read data off your hard drive. Our Website of WATTKART may use third party code and libraries that use "cookies" to collect information and improve their services.

Advertisers using the platform of our Website(s)/Mobile Application(s) of WATTKART to advertise may also assign and use their own cookies to your browser, a process that we do not control.

Once the User(s) permit, we may obtain additional information such as list of apps installed on your device, device information, location, network carrier ("Information") available on your device, to personalize your experience and improve the app suggestions. This data may also be used at our end to take necessary business decisions.

We assure that all or any information of the User(s) shall not be shared with any third party and shall be purely utilized for enhancing each user experience and personalizing the services within WATTKART networks.

6. INFORMATION FROM OTHER SOURCES

- (i) We may receive information about you from other sources, add it to our account information and treat it in accordance with this Privacy Policy.
- (ii) If you provide information to the platform provider or other partner, whom we provide/receive services from, your account information and order information may be passed on to us.
- (iii) We may obtain updated contact information from third parties in order to correct our records and fulfill the services or to communicate with you.

7. DEMOGRAPHIC AND PURCHASE INFORMATION

- (i) We may reference other sources of demographic and other information in order to provide you with more targeted communications and promotions. We use Google Analytics, among others, to track the User(s) behavior on our Website(s)/Mobile Application(s).
- (ii) Google Analytics specifically has been enabled to support display advertising towards helping us to gain understanding of our User(s)' Demographics and Interests.
- (iii) The reports are anonymous and cannot be associated with any individual personally identifiable information that you may have shared with us.

8. LINKS TO THIRD PARTY SITES / AD-SERVERS

Our Website(s)/Mobile Application(s) of WATTKART may also include links to other third party websites or mobile applications. Such websites or mobile applications are governed by their respective privacy policies, which are beyond our control.

Once the User(s) access any built-in third-party service by switching to third party applications/websites [the User(s) can tell where you are by checking the URL in the location bar on your browser]. Use of any information the User(s) provide to such third party is governed by the respective privacy policy of the concerned operator of the said application/website, the User(s) are visiting. That policy may differ from ours. If the User(s) can't find the privacy policy of any of these third-party websites/mobile

applications including accessing their homepage, then the User(s) should contact the application or website owners directly for more information regarding this and/or for any other grievances.

9. INFORMATION SHARING

WATTKART may share the sensitive Personal Information to any third party including Government Bodies / Government agencies / Government authorities / Service Provider / Alliance Partner without obtaining the prior consent of the User(s) in the following limited circumstances:

- (i) When it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offences. These disclosures are made in good faith and belief that such disclosure is reasonably necessary for enforcing the Privacy Policy and Terms of Use and also, for the purpose of complying with the applicable laws and regulations during relevant time.
- (ii) WATTKART proposes to share such information within its group companies/affiliated companies and officers and employees of such group companies/affiliated companies for the purpose of processing Personal Information on its behalf. We also ensure that these recipients of such information agree to process such information based on our instructions and in compliance with this Privacy Policy and Terms of Use also published at our Website(s)/Mobile Application(s) of WATTKART. The said group companies/affiliated companies also ensure that the Personal Information shared with them is not transferred to any third party, except as provided under this clause.
- (iii) WATTKART may use third-party advertising companies to serve ads when the User(s) visit our Website(s)/Mobile Application(s) of WATTKART. These companies may use Personal Information (non-sensitive personal information only) about the User(s)'s visit to our Website(s)/Mobile Application(s) of WATTKART and other third party websites in order to provide advertisements about goods and services of interest to any particular User(s).
- (iv) WATTKART shall transfer information about the User(s) in case it is acquired by or merged with another company.

10. ACCESSING, UPDATING AND DELETION OF PERSONAL INFORMATION

When the User(s) use our Website(s)/Mobile Application(s) of WATTKART:

- (i) We make good faith efforts to provide our User(s), as and when requested by such User(s), with access to their Personal Information and shall further ensure that any Personal Information or sensitive personal data or information found to be inaccurate or deficient shall be corrected, modified or amended as feasible, subject to any requirement for such Personal Information or sensitive personal data or information to be retained by law or for legitimate business purposes.
- (ii) We ask to each individual User(s) to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may

decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required.

- (iii) In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.
- (iv) Upon receiving a specific request coming from any of the User(s), we may ensure that Personal Information in relation to such User(s) is deleted from our database as also from the third-party cloud service providers.
- (v) Because of the way we maintain certain services, after you request for deletion of your Personal Information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems for a certain period of time.

11. GRIEVANCE REDRESSAL MECHANISM

User(s) and/or any other person, whosoever has any grievances of any kind, are requested to click upon the direct link as provided herein below, for necessary action:

[.....]

We will be happy to provide any other necessary clarification in regard to this Privacy Policy or may help you to understand the implications of the same. Further, we may also help you in providing other information, at your request, with respect to our operations, as may be deemed reasonable by us. For the said purpose, you may reach out to the above-mentioned email address/postal address. The said request may take some time to be processed.