

DATA PRIVACY POLICY

VSL Ventures Private Limited and its subsidiaries (the “Company” or “VVPL”)

By entering this website, the visitor consents to the terms of this policy. By submitting his /her Information to the Company, the visitor will be treated as having given his/her, permission for processing the same in a manner provided in this policy.

Introduction

VVPL respects the privacy of individual/visitor and is committed to take reasonable precautions to protect information consisting of Personal information and ‘Sensitive Personal Data or Information’ (SPDI) (“Information”) of visitors of this VVPL website and comply with all legal, regulatory and/or contractual obligations related to privacy. VVPL has adopted the “Privacy by Default” principles in its approach to data privacy i.e. privacy of data and information is upheld first by default.

This policy covers the processing, storage and access to Information as required under lawful and/or contractual activities with VVPL or otherwise required in the normal course of business. It describes VVPL’s policies and procedures on the collection, usage and disclosure of Information provided/received by natural persons and meets the requirements established under:

- The Information Technology Act, 2000 – Section 43A;
- The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011.

1. Scope

This policy applies to all visitors of this VVPL’s website.

2. Information covered by this Policy

This policy applies to Information collected and processed by VVPL consisting of following:

2.1 Personal information is information related to a visitor, or a combination of pieces of information that could reasonably allow him to be identified. Personal information may consist of full name, personal contact numbers, residential address, email address, gender or date of birth. While information such as date of birth in isolation may not be enough to uniquely identify the visitor, a combination of full name and date of birth may be sufficient to do so.

2.2 Sensitive personal data or information (“SPDI”) is such personal information that is collected, received, stored, transmitted or processed by VVPL, consisting of but not limited to:

- Password;
- Financial information such as bank account or credit card or debit card or other payment instrument details;
- Any detail relating to the above personal information categories as provided to VVPL for providing service; and
- Any of the information received under above personal information categories by VVPL for processing, stored or processed under lawful contract or otherwise.

Please note that any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal information.

3. Purpose

VVPL shall collect and use Information for legitimate business purposes in order:

- that a visitor may download product information, order products and take advantage of certain other features of VVPL's website;
- to provide information or interactive services through this website, to the visitor's e-mail address or, where the visitor wishes it to be sent by post, to the visitor's postal address;
- to seek the visitor's feedback or to contact the visitor in relation to the services offered on VVPL's website;
- to process orders or applications submitted by the visitor;
- to administer or otherwise carry out VVPL's obligations in relation to any agreement that the visitor may have with VVPL;
- to anticipate and resolve problems with any goods or services supplied to the visitor;
- to create products or services that may meet the visitor's needs;
- to process and respond to requests, improve VVPL's operations, and communicate with visitor/s about VVPL's products, services and businesses; and
- to allow the visitor to subscribe to VVPL's news alerts.

4. Collection of Information

Only minimum Information required to meet the purposes mentioned in this policy shall be collected from the visitor/s. Neither VVPL nor its representatives shall be responsible for the authenticity of such Information provided by the visitor/s. As normal business practice, VVPL may collect Information in order to enable the secure online authentication, interaction and transaction with natural persons. This may include the installation of cookies and the collection of other session data.

5. Access, Correction of Information and withdrawal of consent

Any modifications / corrections required to the Information can be carried out on the website. In the event the visitor is unable to do so due to lack of functionality in VVPL's

website and / or the visitor wants to withdraw his / her consent to provide SPDI, he / she may contact the IT officer, the details whereof are provided in clause 8 of this policy.

6. Retention, Processing and storage of Information:

6.1 VVPL shall retain Information for only as long as necessary to meet legal or regulatory requirements or for legitimate business purposes as mentioned in this policy.

6.2 VVPL has implemented required security practices and standards in line with the global standards and have a comprehensive information security policy in place, which contains managerial, technical, operational and physical security control measures that commensurate with the information assets being protected with VVPL's nature of business. It is being reviewed periodically to keep pace with business, technology and regulatory changes.

7. Disclosure of Information

7.1 VVPL shall not use or disclose Information for purposes other than as mentioned in this policy, except with the consent of visitor providing such Information or as required by law. However, VVPL may be legally required to disclose the Information in the following cases:

- Where the disclosure is necessary for compliance of a legal obligation;
- Where mandated under the law by government agencies to disclose such Information.

7.2 Where necessary, VVPL may disclose Information to business partners or third parties during the normal course of business. In such cases, VVPL will only share Information related data when VVPL is assured that:

- The Information is processed legitimately and appropriately by the business partner or third party in line with the established consent or in line with legal requirements.
- The business partner or third party has adopted a reasonable and equivalent level of security practices and procedures to ensure security of the Information shared.

8. Feedback or Concern

For feedback or concern, if any, kindly contact:

Email Id: gopal.ghosh@vikramsolar.com