

## **Privacy Notice**

Last updated on December 29, 2023.

We, Lentra AI Pvt. Ltd. ("**Lentra**", "**Company**", "**we**", "**us**", "**our**") are the owners of and responsible for the operations of our website [www.lentra.ai](http://www.lentra.ai) (the "**Website**"). The Website provide information about us, our services, platforms and solutions ("**Services**").

We respect data privacy rights and are committed to protecting personal data collected on this Website. This privacy notice ("Privacy Notice") sets forth *how we collect, use, handle and protect the personal data* collected on this Website. Please read the following carefully before you provide any personal data on the Website.

BY PROVIDING YOUR CONSENT THROUGH THE CHECKBOX, BY CONTINUING TO USE THIS WEBSITE, AND BY PROVIDING US PERSONAL DATA, YOU CONSENT TO OUR USE OF YOUR PERSONAL DATA IN ACCORDANCE WITH THE TERMS OF THIS PRIVACY NOTICE. IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY NOTICE, YOU MAY WITHDRAW YOUR CONSENT OR ALTERNATIVELY CHOOSE NOT TO PROVIDE YOUR PERSONAL DATA ON THE WEBSITE. YOU MAY WITHDRAW YOUR CONSENT BY WRITING TO US AT [grievances@lentra.ai](mailto:grievances@lentra.ai).

IF YOU ACCESS THE WEBSITE ON BEHALF OF A THIRD PARTY/ PERSON, YOU REPRESENT AND WARRANT THAT YOU HAVE THE AUTHORITY TO BIND SUCH THIRD-PARTY TO THE TERMS OF THIS PRIVACY NOTICE AND, IN SUCH AN EVENT YOUR USE OF THE WEBSITE SHALL REFER TO USE BY SUCH THIRD PARTY. IF YOU DO NOT HAVE SUCH AUTHORITY (TO PROVIDE ANY PERSONAL DATA OF A THIRD PARTY) OR DO NOT AGREE TO THE TERMS OF THIS PRIVACY NOTICE, YOU MAY SHOULD REFRAIN FROM USING THE WEBSITE.

This Privacy Notice is an electronic record in the form of an electronic contract being compliant and construed in accordance with the Indian Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 under The Information Technology Act 2000, and the Digital Personal Data Protection Act, 2023 (from the effective date as may be notified by the Government of India) (collectively "**Privacy Rules**") that require publishing of privacy policy for the collection, use, storage and transfer of sensitive personal information.

### **1. Definitions.**

"**Personal Data**" shall mean and include any data about an individual who is identifiable by or in relation to such data,

"**User/s**", "**you**", "**your**" shall mean and include an individual who visits, accesses and/ or uses the Website.

### **2. What Personal Data Do We Collect?**

We may collect your Personal Data in the following ways:

#### **i. Browse the Website, contact us, request for a demo, and/or enrol for our events and webinars.**

When you use our Website, or when you provide information on the 'Contact Us' page or 'Request Demo' page, or when you enrol for our events and webinars, you may provide us your Personal Data, which may include but not be limited to your full name, work email, personal email, phone number, designation, company name.

**ii. Apply for job opportunities.**

When you apply for career opportunities at Lentra through our Website or email, you may provide us with your Personal Data, which may include but not be limited to your full name, email, phone number, information through your CV/ resume, and any other information provided by you.

**iii. Social Media.**

Lentra has presence on social media platforms such as LinkedIn, Facebook, Twitter/X and YouTube. We may receive your Personal Data, when you contact us through our pages on social media platforms.

**3. Accuracy.**

You will be solely responsible for the accuracy, correctness, or truthfulness of the Personal Data shared with us whether of its own or any third party. In the event you share any Personal Data on behalf of a third person, you represent and warrant that you have the authority to share such Personal Data with us, and you have obtained a written consent from such third person, and we will not be responsible for verifying the same. You understand and acknowledge that such Personal Data shall be subject to the terms of this Privacy Notice.

**4. How Do We Use Your Personal Data?**

We use your Personal Data for the following purposes:

A. If you are a user of our Website, we collect your Personal Data for the following purposes:

- i. To verify your identity.
- ii. To deliver our products and services.
- iii. To provide you with a demo of our products.
- iv. To manage the Website and to optimize your experience and customize content on the Website.
- v. To communicate with you regarding existing products and services availed by you, including notifications of any alerts or updates.
- vi. To evaluate, develop and improve our services.
- vii. For market and product analysis and market research.
- viii. To send you information about our other products or services which may be of interest to you.
- ix. To obtain feedback and handle enquiries and complaints.
- x. To comply with legal or regulatory requirements.
- xi. To reach out to you to resolve your grievances.

B. If you apply for a job at Lentra, we may process your Personal Data for:

- i. To verify your identity.
- ii. To conduct background checks.
- iii. For employment evaluation purposes.
- iv. To process your salary.
- v. To process your Personal Data for insurance purposes.
- vi. To track your on-the-job performance.

**5. Legal Grounds of Processing Your Personal Data**

We process your Personal Data by relying on one or more of the following lawful bases:

- i. You have explicitly agreed to/consented to us processing your Personal Data for a specific reason.
- ii. You have voluntarily provided your data to us.
- iii. The processing is necessary for employment purposes.
- iv. The processing is necessary for compliance with a legal obligation we have we may have towards other stakeholders like law enforcement agencies, government agencies, regulators, etc.

Where the processing is based on your consent, you have the right to withdraw your consent at any point in time. Please note that should the withdrawal of consent result in us not being able to continue offering our products and services to you, we reserve the right to withdraw or cease our products and services to you upon your withdrawal. You may withdraw consent by contacting us with a written request to the contact details specified below in the 'Contact Us' section. Upon receipt of your request to withdraw your consent, the consequences of withdrawal will be communicated to you. Upon your agreement to the same, your request for withdrawal will be processed.

## 6. Who Do We Share Your Personal Data with Third Parties?

We may disclose your Personal Data to the following third parties:

- i. **Service Providers:** Any sub-contractors, agents or service providers who work for us or provide services or products to us. All such sub-contractors, agents or service providers are subject to stringent confidentiality restrictions consistent with this Privacy Notice.
- ii. **Legal and Regulatory Authorities:** Law enforcement authorities, government authorities, courts, dispute resolution bodies, regulators, auditors and any party appointed or requested by applicable regulators to carry out investigations or audits of our activities. Statutory and regulatory bodies, authorities (including the government) investigating agencies and entities or persons, to whom or before whom it is mandatory to disclose Personal Data as per the applicable law, courts, judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunals.
- iii. **Affiliates:** Our affiliates to enable them to improve the services.
- iv. **Merger or Acquisition:** If we are acquired by another entity, or if we merge with another company or transfer a part of our business, including the Website, to a third party, we may share your Personal Data. Any such third party or resultant entity that receives your Personal Data shall have the right to continue to use your Personal Data in line with the purposes set out herein. In the event of such a sale or transfer, we shall notify you.

## 7. Cross-Border Data Transfer

The data collected from you is stored in India. The Personal Data we hold about you may be transferred to other countries outside your country of residence for any of the purposes described in this Privacy Notice.

Any Personal Data that we transfer will be protected in accordance with this Privacy Notice as well as with adequate protections in place in compliance with applicable laws and regulations.

## 8. Use of Cookies and Other Tracking Mechanisms

We may use cookies and other tracking mechanisms on our Website to collect data about you, which may include your Personal Data.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information about your actions to the owners of the website.

Most web browsers allow you some control of cookies through browser settings.

Outlined below are the categories of cookies along with a description of what they are used for.

- i. **Strictly Necessary Cookies:** These cookies are needed to run our website, to keep it secure and to comply with regulations that apply to us.
- ii. **Functional Cookies:** We may use functional cookies on our website. These cookies allow us to remember information you enter or choices you make (such as your username, language, or your region) and provide you with enhanced, more personalised features.
- iii. **Performance/Analytics Cookies:** We may use performance/analytics cookies on our website. These cookies collect information about how visitors use our website and services, including which pages visitors go to most often and if they receive error messages from certain pages. It is used to improve how our website functions and performs.
- iv. **Marketing Cookies:** We may use marketing cookies on our website. These cookies help us decide which of our products, services and offers may be relevant for you. We may use this data to tailor the marketing and ads you see on our own and other website and mobile apps, including social media. For instance, you may see our ads on other sites after you have been to our website.

## **9. How Do We Secure Your Personal Data?**

We are committed to protecting your Personal Data in our custody. We take reasonable steps to ensure appropriate physical, technical and managerial safeguards are in place to protect your Personal Data from unauthorized access, alteration, transmission and deletion. We ensure that the third parties who provide services to us under appropriate contracts take appropriate security measures to protect your Personal Data in line with our policies.

## **10. How Long Do We Keep Your Personal Data?**

We keep the Personal Data we collect about you for as long as it is required for the purposes set out in this Privacy Notice and for legal or regulatory reasons.

## **11. Children's Privacy**

We do not knowingly collect Personal Data from children. If you are a parent or guardian and aware that your Child has provided us with Personal Data, please contact us using the details in the 'Contact Us' section of this Notice.

## **12. Links to Other Websites**

Our Website may contain links to websites of other organizations. This Privacy Notice does not cover how those organizations process your Personal Data. We encourage you to read the Privacy Notices on the other websites you visit.

## **13. Governing laws**

This Privacy Notice shall in all respects be governed by and construed and enforced in accordance with the laws of the Republic of India and the courts in Pune shall have an exclusive jurisdiction to adjudicate any subject matter under this Privacy Notice.

## **14. Contact Us**

If you have any questions or concerns or grievances regarding this Privacy Notice or wish to withdraw your consent in relation to the processing of your Personal Data, you can reach out to our appointed grievance redressal officer at [grievances@lentra.ai](mailto:grievances@lentra.ai).

**Company Address:**

Lentra AI Private Limited.  
202 Amar Tech Park,  
31/5, Balewadi,  
Balewadi-Hinjewadi Road,  
Pune – 411045.

**15. Notification of Changes**

We regularly review and update our Privacy Notice to ensure it is up-to-date and accurate. Any changes we may make to this Privacy Notice in future will be posted on this page.

**16. Your Privacy Rights**

Under the Digital Personal Data Protection Act 2023 in India, you have the following rights, and we commit to provide you with the same:

- i. **Right of Access:** You have the right to receive a confirmation on what Personal Data is being processed by us along with the processing activities undertaken as well as identities of all the third parties with whom your Personal Data has been shared along with the description of the Personal Data shared.
- ii. **Right to Correction:** You have the right to ask us to rectify your Personal Data that is with us that you think is inaccurate. You also have the right to ask us to complete your Personal Data that you think is incomplete.
- iii. **Right to Erasure:** You have the right to ask us to erase your Personal Data that is with us under certain circumstances.
- iv. **Right of Grievance Redressal:** You have the right to lodge a complaint with the Data Protection Board in case you do not receive a satisfactory response from us with regard to your grievance.
- v. **Right to Nominate:** You have the right to nominate a person who would act on your behalf in case of death or incapacitation.

If you wish to make a request to exercise any of your rights, you can contact us using the details in the 'Contact Us' section of this Notice.