

### **Valuecom Privacy Policy**

Date of Last Revision: 17th Aug, 2022

#### **Owner and Data Controller**

Valuecom Infosolutions Private Limited 90/2-B, 13th Cross, 9th Main, Ideal Homes Layout Phase 1, Rajarajeshwari Nagar, Bangalore - 560 098

#### Owner contact email: privacy@valuecom.co

Valuecom wants to help you better understand how we collect, use, protect and share your personal data. This Privacy Policy is designed to help you understand your privacy choices when you visit our site, use our mobile app or any of our services. It does not apply to other websites or services that we do not control, including websites or services of other Valuecom users.

This Privacy Policy is incorporated into, and forms an integral part of, the Valuecom Terms of Service and in adherence to Privacy Shield Principles. Capitalized terms have the meanings ascribed them in the Definitions section or our Terms of Service. Please note that our services may vary by region.

We encourage you to read this Privacy Policy carefully and take the time to get to know our practices. If you have questions about this Privacy Policy or our privacy practices, please contact us at <u>privacy@valuecom.co</u>.

#### 1. Definitions

- 1. Information Types
  - 1. "Account Information" means data about how and when a Valuecom account is accessed and the features used, including Store Information.
  - 2. "Browser Information" means provided by a browser, including the IP address, the website visited, network connection, device information and other data, including Cookies.
  - 3. "Contact Information" means basic personal and business information, such as first and last name, company name, email address, postal address, phone number and may include social media account information.
  - 4. "Device Information" means information about your device, such as device ID number, model and manufacturer, version of your operating system and geographical region, collected from any devices when accessing our website, using the Mobile App, or any of our services.

- 5. "Payment Information" means, for example, credit card, ACH or other payment information.
- 6. "Security Information" means user ID, password and password hints and other security information used for authentication and account access.
- 7. "Store Information" means information about your store, its products and its architecture.
- 8. "Support Information" includes information about your hardware and software, authentication data, chat session contents, error reports, performance data and other communication or technical information and may, with express permission, include remote access to facilitate troubleshooting.
- 9. "Transaction Information" means the data related to transactions that occur on our platform, including product, order, shipping information, Contact Information and Payment Information.
- 10. "Usage Information" means information collected when you interact with the Valuecom website, mobile application or any of our services, including functionalities accessed, pages visited and other interaction data.
- 2. "Automated Decision Making" means a decision made solely by automated means without human involvement.
- 3. "Controller" means an entity that determines the purposes and means of the Processing of Personal Data.
- 4. "Cookie" a small file that resides on your computer's hard drive that often contains an anonymous unique identifier that is accessible by the website that placed it there, but is not accessible by other sites
- 5. "Merchant" means an entity that has used or is using the services for ecommerce.
- 6. "Mobile App" means the Valuecom Mobile Application available through third-party app stores for mobile devices.
- 7. "Partner" means a separate legal entity that is a participant in our Agency Partner Program, our Technology Partner Program or other third-party technology integration with the Valuecom platform, a theme designer, reseller, or referrer of the services.
- 8. "Personal Data" or "Personal Information" means information that (i) relates to an identified or identifiable natural person, or (ii) identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.
- 9. "Processing" means any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, including, but not limited to, alteration, collection, organization, recording, retrieval, storage, transmission and use.
- 10. "Processor" means the entity which processes Personal Data on behalf of the Controller.
- 11. "Sensitive Personal Data" means any data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, or data concerning health or a natural person's sex life and/or sexual orientation.

- 12. "Shopper" means an entity or natural person that interacts with the ecommerce offering of a Merchant through the Valuecom platform.
- 2. Merchants
  - 1. Merchant Policies. Merchants should help Shoppers understand how the Merchant, Valuecom and relevant third parties collect and process Shoppers' Personal Data. To that end, Merchants must:
    - 1. post an accurate privacy policy on their storefront that complies with all applicable laws and regulations;
    - 2. process Personal Data in accordance with applicable laws and, to the extent required under such laws, provide notice to and obtain informed consent from Shoppers for the use and access of their Personal Data by Valuecom and other third parties; and
    - 3. if the Merchant is collecting any Sensitive Personal Data from Shoppers, obtain affirmative, explicit and informed consent and allow such Shoppers to revoke their consent to the use and access of Sensitive Personal Data at any time.
  - 2. Information Collected.
    - 1. When a Merchant interacts with our Website, for example, by signing up for a trial, a subscription or a newsletter or other content, or performing transactions, Valuecom may collect and control information such as Account Information, Browser Information, Contact Information, Payment Information, Support Information, Device Information, Security Information, Transaction Information, Usage Information and set a Cookie.
    - 2. When a Merchant interacts with our Mobile App, Valuecom may collect and control information such as Account Information, Contact Information, Device Information, Usage Information and Security Information.
  - 3. Information Usage.
    - 1. 1. We use this information as a Controller to provide Merchants with our services, confirm identities, provide support such as debugging, troubleshooting, automated decision making such as the detection of fraudulent account creation when signing up for our service, for advertising and marketing, invoicing, to resolve incidents related to the use of our Website and services, to improve and personalize our services, such as push notifications regarding your store activities, and to comply with legal requirements. We may disclose certain information, including Account Information, Contact Information, Support Information and Transaction Information, to Partners subject to confidentiality obligations that refer Merchants to us or are engaged by a Merchant to provide services, apps or products relating to the Merchant's store(s) or use of our Website and services, or to confirm identities and improve and personalize our interactions and services. We may use this information in other cases where the Merchant has given express consent.
  - 4. Partners
    - 1. Information Collected

When a Partner signs up for a partner account or refers a Merchant to us, Valuecom may collect and control information such as Account

information, Browser Information, Contact Information, Payment Information, Support Information, and Usage Information.

2. Information Usage

We use this information as a Controller to provide Partners with our services, confirm identities, provide support, for advertising and marketing, invoicing, to resolve incidents related to the use of our Website and services, to improve and personalize our services, and to comply with legal requirements. We may use this information in other cases where the Partner has given express consent.

- 5. Visitors
  - 1. Information Collected

When visitors browse our Website, or engage in communications with us online or offline, we may collect and control, as applicable, Browser Information, Support Information, Contact Information, and Usage Information submitted or communicated to us.

2. Information Usage

We use this information as a Controller to provide our services, and improve and personalize communications, interactions, our services, and provide support if needed. We may use this information in other cases where the Visitor has given express consent.

- 6. Shoppers
  - 1. Information Collected

When Shoppers interact with a Merchant's ecommerce offering through the Valuecom platform, we may collect and process Browser Information and Transaction Information of the Shopper on behalf of the Merchant.

2. Information Usage

We use this information as a Processor to provide our services to Merchants, support and process orders, and manage risk and fraud. The Merchant is the Controller of this information and Shoppers who have questions about our use of this information should contact the Merchant. We may also use certain information as a Controller to improve and personalize our services, and manage risk and fraud.

- 7. Legal Basis for Processing (EEA visitors only)
  - 1. Lawful Basis

We generally collect personal data from you only where (i) we need the personal information to perform a contract with you, (ii) the processing is in our legitimate interests and not overridden by your rights, or (iii) we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

2. Notice

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not, as well as of the possible consequences if you do not provide your personal information.

3. Legitimate Interest If we collect and use your personal information in reliance on our

legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are. For instance, we may rely on our legitimate interests when responding to your queries, improving and personalizing our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities (e.g. checking your identity, fraud prevention).

4. Questions

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 on <u>privacy@valuecom.co</u>

- 8. Communications
  - 1. Promotional

We may send promotional communications to existing and prospective Merchants, Partners and visitors by email, phone, and other channels, such as LinkedIn. For example, we may notify a Merchant when a subscription is ending.

2. Account

We send certain required communications, such as account notices or information, to users of our services. You may not opt out of receiving these communications if you have an active storefront.

9. Information Sharing

Our services are possible because of a variety of third parties and service providers. Sometimes it is necessary to share Merchant, Partner or Shopper Personal Data with them to support our services. We may access, transfer, disclose, and/or retain that Personal Data with consent or in the following circumstances.

1. Compliance

If we have a good faith belief that doing so is necessary to: (i) comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies; or (ii) protect the rights or property of Valuecom, including enforcing the terms governing the use of the services.

2. Protection

If we have a good faith belief that doing so is necessary to: (i) protect Merchants, Partners, Shoppers, or visitors; for example, to prevent spam or attempts to defraud us or users of our services, or in response to threats of safety of any person; or (ii) operate and maintain the security of our products, including to prevent or stop an attack on our computer systems or networks.

3. Affiliates

We share Personal Data among Valuecom-controlled affiliates and subsidiaries for the purposes described in this Privacy Policy.

4. Service Providers

Valuecom may use from time to time a limited number of third-party service providers, data processors, contractors and other businesses to assist us in providing our services for the purposes described in this Privacy Policy.

5. SDKs and APIs Valuecom may include third-party libraries such as Software

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Development Kits (SDKs) or Application Interfaces (APIs) within our applications (including the Mobile App) for the purposes described in this Privacy Policy, including the following:

Functional SDKs

These are software libraries we use to enhance the end user experience and functionality within the application, such as graphics and display of images within the app, and in-app notifications according to preferences.

Analytics SDKs

These are external third-party sub processors' libraries we use in collecting device and usage data for application performance monitoring.

6. Payment Processing

We share payment data with banks and other entities that process payment transactions or provide other financial services and for fraud prevention & credit risk reduction.

7. Apps

Upon receiving a Merchant's consent to install an application, we will share the Merchant's Contact Information and other information requested by the app with the app Partner.

8. Merger/Sale

We may also disclose Personal Data as part of a corporate transaction such as a merger or sale of assets.

10. Automated Decision-Making

Some Personal Data may be used in Automated Decision Making to help us screen accounts for risk, fraud or abuse concerns. You can object to profiling, including profiling for marketing purposes or contest or dispute such decisions by contacting us on <u>privacy@valuecom.co</u> Subject to applicable law, we can provide you with details underlying the automated decision-making review and rectification of any inaccuracies.

### 11. Cookies

1. Usage

Valuecom and its third-party service providers use cookies, web beacons and similar tracking technologies to recognize you when you visit our website, remember your preferences, and give you a personalized experience. When you visit our websites, we, or an authorized third party, may place a cookie on your device that collects information, including Personal Data, about your online activities over time and across different sites. Cookies allow us to track use, infer browsing preferences, and improve and customize your browsing experience.

2. Persistence

We use both session-based and persistent cookies on our websites. Persistent cookies remain on your computer when you have gone offline, while session cookies are deleted as soon as you close your web browser. A website may set a cookie if the browser's preferences allow it. A browser only permits a website to access the cookies that it has set, not those set by other websites.

3. Types



Essential

These cookies are necessary for our website to work as intended.

- Functional These cookies enable enhanced functionality, like videos and live chat. Without these cookies, certain functions may become unavailable.
  - Analytics These cookies provide statistical information on site usage. For example, these cookies enable web analytics that allow us to improve our website over time.
- Targeting and Advertising These cookies are used to create profiles or personalize content to enhance your experience.
- 4. Control

It is possible to disable cookies through your device or browser settings, but doing so may affect your ability to use our website. For instance, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our website. The method for disabling cookies may vary by device and browser, but can usually be found in preferences or security settings of each respective browser.

5. Other Resources

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <u>allaboutcookies.org</u> or <u>aboutcookies.org</u>

12. Third Party Application Stores

Third party application stores, such as Apple's App Store or Google's Google Play, might collect additional information and share them with us. Please refer to the application store's Privacy Policy to better understand how they process any of the personal information they collect and share with app publishers like ourselves.

- 13. Information Protection.
  - 1. We maintain administrative, technical and physical security measures designed to provide reasonable protection for Personal Data against unauthorized access, disclosure, alteration, loss, and misuse. These security measures include access controls, encryption, and firewalls. Unfortunately, no method of Internet use, data transmission, or electronic storage is completely secure, so we cannot guarantee the absolute security of Personal Data.
  - 2. 2. While we are dedicated to securing our Website and services, you are responsible for securing and maintaining the privacy of your passwords and account information. We are not responsible for protecting Personal Data shared with a third-party based on an account connection that you have authorized.
- 14. Data Subject's Rights.
  - 1. General

You can exercise rights over your Personal Data against the Controller. We provide reasonable steps to allow you to access, rectify, erase, port, or restrict the use of your Personal Data. You have the right to object

to the use of your personal data at any time, subject to applicable law. When collection is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal by applicable law. If applicable by national law, you have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data relating infringes your rights.

- 2. Merchants, Partners, and Visitors Merchants and Partners are able to update many types of collected Personal Data directly within their accounts. Please contact us if you are a Visitor or otherwise unable to access or otherwise change your Personal Data within your account.
- 3. Shoppers

We serve as a Processor for Merchants. Shoppers may wish to contact Merchants directly regarding their Personal Data. We can forward Shopper requests for access or deletion to Merchants, but we are unable to delete Merchant data. Requests for deletion of Personal Data may adversely affect our ability to serve you.

1. Disclosures

Valuecom does not sell Personal Information. We share Personal Information with authorized service providers or business partners who have agreed to our contractual limitations as to their retention, use and disclosure of such Personal Information. We also share Personal Information if you use our services to interact with third parties or direct us to disclose your Personal Information to third parties.

2. Information Collected

We collect the following types of information from you, your device(s), or from third parties:

- identifiers, such as Browser Information, Device Information, and Security Information;
- commercial information, such as Account Information, Contact Information, Transaction Information, and Usage Information;
- internet or network information, such as Browser Information and Device Information;
- o geolocation data, such as Browser Information and Device Information;
- financial information, such as Payment Information;
- o other Personal Information, such as Support Information; and
- information derived from other categories, which could include your preferences, interests, and other information used to personalize your experience
- 3. We may disclose this Personal Information for the business purposes described in this privacy policy, such as disclosures to service providers that assist us with securing our services or marketing our products.
- 4. Data Requests

To exercise your "right to know" and your "right to request deletion," please contact us at <u>privacy@valuecom.co</u> To protect your Personal Information, we will verify your identity by a method appropriate to the type of request you are making. We may also request that your authorized agent have written permission from you to make requests on your behalf, and we may also need to verify your authorized agent's identity to protect your Personal Information.



### **Data Protection Policy**

The GDPR (General Data Protection Regulation) sets out seven principles for lawful processing of personal data. Processing includes the collection, organization, structuring, storage, alteration, consultation, use, communication, combination, restriction, erasure or destruction of personal data. Broadly, the seven principles are:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

Data controllers are:

- responsible for complying with the principles and letter of the regulation.
- Data Controllers are also accountable for their processing and must demonstrate their compliance

### Personal data shall be

- processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organizational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ('integrity and confidentiality')."

### **Types of Data collected**

Among the types of Personal Data that www.valuecom.co collects, by itself or through third parties, there are: Cookies; Usage Data; email address; phone number.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using www.valuecom.co

Unless specified otherwise, all Data requested by www.valuecom.co is mandatory and failure to provide this Data may make it impossible for www.valuecom.co to provide its services. In cases where www.valuecom.co specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by www.valuecom.co or by the owners of third-party services used by www.valuecom.co serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through www.valuecom.co and confirm that they have the third party's consent to provide the Data to the Owner.

### Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of <u>www.valuecom.co</u> (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

• Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing ("opt-out"), without having to rely on consent or any other of the

following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;

- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data. Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data. If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

### **Retention time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfil such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of

access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

### The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Analytics, User database management, Managing contacts and sending messages and Hosting and backend infrastructure.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

### Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

### Analytics

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

### **Google Analytics (Google Inc.)**

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of <u>www.valuecom.co</u>, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies; Usage Data. Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

### Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable <u>www.valuecom.co</u> to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of www.Valuecom.com.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

### Amazon Web Services (AWS) (Amazon Web Services, Inc.)

Amazon Web Services (AWS) is a hosting and backend service provided by Amazon Web Services, Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy.

#### Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

#### User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to <u>www.valuecom.co</u>, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving <u>www.valuecom.co</u>.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on <u>www.valuecom.co</u>.

#### The Data Protection rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- Your Right to Withdraw Your Consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Your Right to Object to Processing. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Your Right of Access. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Your Right to Rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- Your Right to Restriction of Processing. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Your Right to Erasure. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- Your Right to Data Portability. Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is

applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.

• Your Right for Review. Users have the right to bring a claim before their competent data protection authority.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at <u>privacy@Valuecom.co</u> if you wish to make a request.

### Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification.

To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

#### **Cookie Policy**

www.valuecom.co uses Trackers. To learn more, the User may consult the Cookie Policy.

### Information about Data collection and processing

#### Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of <u>www.valuecom.co</u> or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

#### Additional information about User's Personal Data

In addition to the information contained in this privacy policy, https://www.valuecom.co may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

#### System logs and maintenance

For operation and maintenance purposes, https://www.valuecom.co and any third-party services may collect files that record interaction with https://www.valuecom.co (System logs) use other Personal Data (such as the IP Address) for this purpose.

#### Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

### How "Do Not Track" requests are handled

<u>https://www.valuecom.co</u> does not support "Do Not Track" requests. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

### **Rights Requests**

Any requests to exercise User rights, data access, rectification and erasure can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

In compliance with the Privacy Shield Principles, Valuecom commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Valuecom at: privacy@valuecom.co or the Controller:

Valuecom Infosolutions Private Limited, 90/2-B, 13th Cross, 9th Main, Ideal Homes Layout Phase 1, Rajarajeshwari Nagar, Bangalore - 560 098 Attention: Legal Department

Customers wishing to make a related enquiry for access or their PII data deletion / modification can make an enquiry via email to: <u>gdpr@valuecom.co</u>

Valuecom will respond to any such inquiries or complaints without undue delay and in accordance with applicable law.

### **Policy Revision**

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within <u>www.valuecom.co</u> and/or – as far as technically and legally feasible – sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.