

Privacy Policy – SatLeo Labs Private Limited

Disclaimer:

“We have substantially updated our Privacy Policy in line with the requirements of the Digital Personal Data Protection Act, 2023 (DPDPA), including segregating and categorizing the personal data collected and appointing the requisite grievance officers.

Since the implementing rules have only recently been notified and an 18-month compliance runway has been provided, we are currently monitoring industry reactions, regulatory clarifications, and the constitution of the Data Protection Board. These developments will help us further align our privacy practices and policies with the final expectations under the law.

We anticipate that this alignment exercise can be completed with greater certainty over the next year.”

1. Introduction

Satleo Labs Private Limited (“we”, “us”, “our” or “Satleo”) values your privacy and is committed to safeguarding personal information relating to you (“you”, “your” or “User”), such as your name, email address, or phone number (“Personal Data”). This Privacy Policy explains who we are, what Personal Data we collect, why we collect it, how we use it, with whom we share your Personal Data, and your rights regarding your Personal Data. It applies when you visit or access our website and survey forms (“Platform(s)”) in connection with your interactions with us or your use of our products and services. It also applies to prospective customers of our business and enterprise products.

This Privacy Policy should be read along with our [Terms and Conditions](#) any separate product or service agreements, and any privacy notices provided when your Personal Data is collected. By providing your Personal Data and using our Platform, products and services, you agree to the terms outlined in this Privacy Policy. If there is a conflict between this Privacy Policy and a specific privacy notice, the terms of the specific privacy notice will prevail.

Please review this Privacy Policy carefully. Do not use the Platform if you do not agree with this Privacy Policy or any other agreement governing your use of our Platform, product and services. If you provide Personal Data or other information about someone other than yourself, or on behalf of an entity, organization, or body corporate, you confirm that you have the legal right, including consent where necessary, to provide the information for the specified purpose. Please note that this Privacy Policy does not apply to our affiliates or partners, each of whom may have their own privacy policies. In situations where you interact with such partners, we strongly encourage you to review the applicable privacy policy for that particular site, service, or interaction.

2. Who we are and who should read this Privacy Policy?

The Platform is operated and managed by Satleo, a company registered under the laws of India, offering a variety of products and services, including customer support and online services. When processing your Personal Data related to your use of the Platform, Satleo acts as a data fiduciary under applicable data protection laws, including but not limited to the Digital Personal Data Protection Act 2023, the

Information Technology Act 2000, and any other relevant data protection regulations, as amended from time to time.

3. Where we collect your Personal Data from?

Summary: We collect and process your Personal Data which: (i) you give to us directly when you use our Platform, such as your name, contact details and your company/organization name; (ii) we collect about you based on your use of our Platform; and (iii) we obtain from third parties on your behalf.

We may collect your Personal Data from several sources, including:

(i) **Personal Data you provide directly:**

This includes any Personal Data you share with us through our Platform or other means, such as when you create service requests through a web form on our Platform or social media channel, or directly communicate with our customer support.

(ii) **Personal Data we collect automatically:**

When you use our Platform or services, we use automated means such as cookies and similar technologies to automatically collect certain data about you, including your Personal Data, usage patterns, device information, and other technical details that help us improve your experience.

(iii) **Personal Data we receive from third parties:**

We may also receive data, including Personal Data, about you from external sources, such as our business partners, or third-party platforms. If you connect to our Platform through these third-party services, we may gather additional data to verify your identity or enhance our services.

4. What Personal Data we process and why?

Summary: We may process a variety of your Personal Data depending on how you interact with us through our Platform, including through a third-party platform. For instance, when you interact with us and make a business inquiry about our products or services through our Platform, we require your name, contact details, etc. to communicate with you and provide you our products and services.

By using our Platform or our products and services, you consent to us processing your Personal Data, directly from you or through other methods, including but not limited to:

| S.No. | User Activity and Personal Data Collected |
|-------|---|
| i | <p>Visiting/browsing our Platform</p> <p>When you visit our website or other Platforms, we automatically collect certain technical and behavioral data. We place cookies and other similar tracking technologies on your browser or device that help us to manage our Platforms (including ensuring data security, improving the design and performance of our websites and better understanding the visitor's behavior). The data collected by these cookies and similar technologies includes:</p> |

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| | <p>(a) <u>Device information</u>: We collect device information, including browser type, device type, unique device identifiers, operating systems type and version, software characteristics, URLs, usage statistics, IP address, language preference, referring site, and network information.</p> <p>(b) <u>Location information</u>: We may determine approximate geographic location of your device from your IP address, including country, city, and geographic coordinates.</p> <p>(c) <u>Usage information</u>: We collect data about how you use of our Platform. This includes the date and time stamps of your visit to the Platform, the content and web pages viewed, time spent on each web page, click data, referrer, and other usage details.</p> <p>Purpose: Enabling access to our Platforms; Offering our products and services; Identifying unique users; Researching and analysing how users use our Platforms and services; Improving Platforms' services or business development activities; Preventing frauds and security breaches.</p> |
| ii | <p>Contacting us</p> <p>When you contact us, whether as an enterprise customer, institutional client, government body, research organisation, business partner, or other stakeholder, we process certain Personal Data to manage our business relationship, respond to your request, and comply with applicable laws.</p> <p>(a) <u>Sending us a business enquiry</u>: If you submit a business or partnership enquiry through our dedicated web forms, email, or by contacting our representatives, including as a prospective or existing customer, government or institutional client, research partner, collaborator, investor, vendor, or media/PR representative, we process certain Personal Data. This may include, among other things, your full name, business email address, business address, business telephone number, organisation name and designation, location data (city, state, and country), information relating to the nature or category of products or services for which the enquiry is made, and any information or records shared during your interactions with us (including call recordings, where permitted under applicable law).</p> <p>(b) <u>Contacting customer support or creating service request</u>: You may contact Satleo's support or business development team through our Platform, email, phone, or third-party communication channels (such as messaging applications) to request a product demonstration, pilot engagement, technical consultation, submit a query, or raise a concern. In such cases, we process Personal Data as necessary to assist you effectively, which may include, among other things, your full name, email address, phone number, organisation details, city and state, information relating to the products or services in respect of which support is sought, and records of our communications (including call recordings, where permitted by applicable law).</p> <p>Purpose: Researching and analysing how users interact with our Platforms and services; offering and improving our products and services; communicating with, responding to, and providing support in relation to your enquiry, request, or engagement; developing and</p> |

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| | implementing our business development and outreach activities; and complying with applicable laws and regulatory requirements. |
| iii | <p>Engaging with us on Social Media Platforms or other third-party Platforms</p> <p>(a) <u>Interacting with us on Social Media</u>: When you interact with us on social media or other public platforms (e.g., sharing comments on posts of our official pages on different social media platforms), we may process Personal Data that you make publicly available on these platforms. This includes your full name or username (as displayed on the social media platform), your profile picture (if publicly available); country (if indicated on your profile); any comments or content you post publicly regarding us.</p> <p>(b) <u>Third-party Analytics</u>: We may also gather Personal Data from public and third-party sources, such as third-party analytics service providers, on the internet about your online activities, including information publicly available, and contact details from third-party commercial sources, like social media sites or Google services. This collection of Personal Data is in addition to any information you submit to us directly or we collect by automated means (See above <u>Where we collect your Personal Data from</u>).</p> <p>Purpose: Researching and analysing how users use our Platforms and services, product and services; Offering our products and services; Communicating, responding or providing support in relation to your inquiry, question, or service request; Developing and implementing our marketing, business development activities; Complying with applicable laws and regulations.</p> |

5. Why and how we process your Personal Data?

Summary: *We use Personal Data we collect about you to provide our services to you and improve those services, administer our Platform, communicate with you and use your Personal Data on an anonymous basis for research and analytical purposes, and comply with applicable law.*

We process your Personal Data collected through your use of our Platform for various purposes, including providing, improving, and securing our services, as well as communicating with you. Here's a breakdown of the purposes for which we use your data:

| S.No. | Purpose | How we use it? |
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| 1. | Enabling access to our Platform and Offering our products and services | <p>We use your Personal Data to provide and maintain our Platform, products, and services by:</p> <ul style="list-style-type: none"> a) verifying your identity and managing your relationship with us; b) administering our Platform and performing internal operations, such as troubleshooting, data analysis, testing, and monitoring usage trends; c) customizing your experience by remembering your preferences like language and region; d) displaying personalized content and allowing you to communicate business inquiries, complaints, or service requests; |

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| | | e) facilitating access to our products and services. |
| 2. | Communicating with, responding to, or providing support in relation to your inquiry, question, or service request | <p>We may use your Personal Data, including information from third parties, to:</p> <ul style="list-style-type: none"> a) contact you via email, SMS, phone, or social media regarding your interest in our products, services, or inquiries; b) verify your identity when communicating with you; c) Provide updates about your requests or inquiries, administrative messages, and notifications about service changes or new features; d) respond to your business enquiries and service requests; e) assist with our customer support services to investigate and resolve your queries, monitor and improve our customer support responses; f) fulfil requests for content, services, and features. |
| 3. | Developing and implementing our marketing and business development activities | <p>With your consent, we may use your Personal Data to:</p> <ul style="list-style-type: none"> a) provide you with information about other products and services we feel may interest you or be best for you; b) administer marketing communications, surveys; c) recommend products or services that match your interests; d) gathering feedback and improving our services; e) display our ads on third-party websites and apps that you may use. |
| 4. | Preventing frauds and security breaches | <p>We use your data to protect our Platform and users from fraud and security threats. This includes:</p> <ul style="list-style-type: none"> a) preventing, detecting, and investigating criminal activity, misuse, or network damage; b) securing the Platform from unauthorized access, malware, viruses, and other IT security threats; c) verifying identities and ensuring the safety of our Platform and users, and the integrity of our Platform and users; d) ensuring proper functioning, troubleshooting and network security to protect your Personal Data from potential harm or misuse. |
| 5. | Improving our Platform and services | <p>We use your Personal Data to enhance our Platform and services by:</p> <ul style="list-style-type: none"> a) collecting statistics on Platform usage, personalising your experience and interactions with us, and expanding our services; b) analyzing trends, track usage, and developing new features. This may include using Artificial Intelligence in line with our policies; c) aggregating Personal Data on an anonymous basis with other data for data analytical and reporting purposes; |
| 6. | Complying with applicable laws and regulations | <p>We may use your Personal Data to comply with legal obligations, including:</p> <ul style="list-style-type: none"> a) responding to requests or orders from courts, tribunals, regulatory bodies, government agencies, or supervisory authorities; b) investigating and resolving to address claims or disputes related to our services. c) establishing, exercising, or defending legal claims in court or before regulatory authorities in situations where it is necessary to establish, exercise, or defend legal claims, we may process your personal data in legal proceedings, whether in court or before regulatory bodies; |

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| | | d) managing risks, seeking legal advice, and protecting our business and the Platform. |
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6. Who we share your data with?

Summary: We share the data we collect from you within our organization and with our affiliate companies, third-party vendors, and service providers (such as those assisting with surveys), and our business partners. Additionally, we may disclose your data for security purposes, legal compliance, or during corporate restructuring. Lastly, we may share your personal data in way not specified in the Privacy Policy, if we have obtained your explicit consent.

We share the data collected from you, with your consent, internally within our business and with third parties, in accordance with this Privacy Policy or as required by law. To clarify, we do not sell or otherwise disclose your Personal Data for unrelated purpose. Here's a breakdown of third parties with whom we may share your data:

| S.No. | Who we share the data with: | Why we share the data: |
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| 1. | Service providers | We engage third-party service providers to support our operations and deliver our services, including but not limited to cloud infrastructure providers, data storage and processing vendors, IT and cybersecurity service providers, analytics vendors, professional advisors, and communication or customer relationship management service providers. These service providers process Personal Data solely on our behalf, in accordance with our documented instructions, and are contractually obligated to implement appropriate confidentiality, security, and data protection safeguards and not to use such Personal Data for any independent purposes, except as required under applicable law. |
| 2. | Business partners | In certain circumstances, we collaborate with trusted business, research, or institutional partners to offer or deliver joint products, services, pilots, demonstrations, or projects. Where you request or participate in such engagements, we may share relevant Personal Data with such partners to the extent necessary to facilitate the engagement, such as arranging a demonstration, pilot deployment, or consultation. Each partner processes your Personal Data in accordance with its own privacy policy and applicable data protection laws, and we encourage you to review such policies where relevant. |
| 3. | Legal and regulatory purposes | We may disclose your data with third parties (such as governmental authorities, law enforcement agencies, etc.) if: <ul style="list-style-type: none"> (a) necessary to comply with applicable laws and regulations or directions of governmental authorities or law enforcement agencies, court judgments, decree or orders under any law in force; (b) required to respond to a valid subpoena, warrant, or court orders; |

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| | | <ul style="list-style-type: none"> (c) necessary to prevent, detect and prosecute any kind of fraudulent/illegal behaviour; (d) to enforce our Terms and Conditions or other policies; (e) needed to investigate and defend ourselves against claims or allegations; (f) necessary to protect the rights and safety of Satleo, our customers, personnel or others; (g) required by our auditors and legal advisors to assess our disclosure obligations and rights under this Privacy Policy; (h) permitted or required by law. |
| 4. | Corporate Transactions / Change in Control / Business Transfer | If we are involved in a merger, acquisition, restructuring, or sale of assets, your Personal Data may be transferred as part of that transaction. Any recipient of your data will be obligated to protect it according to this Privacy Policy. |
| 5. | With your consent | If you give explicit consent or make a specific request, we may share your data with other parties for purposes not covered in this Privacy Policy. |

7. How long we keep your Personal Data?

Summary: *We delete your Personal Data that we hold when it is no longer necessary for us to fulfil the purposes mentioned in this Privacy Policy, or when you request us to delete your Personal Data by writing to us at info@satleolabs.com. However, we can keep your data for a while even after your request for deletion in accordance with the applicable law*

We keep your Personal Data for as long as necessary to provide our services and fulfill the purposes outlined in this Privacy Policy. Once the data is no longer needed for these purposes or to meet legal, regulatory, or business requirements, we will securely delete it.

You may request deletion of your Personal Data by writing to us at info@satleolabs.com. While we work to fulfil such deletion requests, we may need to retain certain Personal Data for a while longer for the following reasons:

- (a) to perform our contractual obligations to which you are subject or to respond to your questions or provide necessary service or support;
- (b) To prevent fraud, resolve complaints, address inquiries, or exercise/defend legal claims, including providing evidence in legal proceedings;
- (c) to comply with legal obligations, exercise our rights, resolve disputes, or for security and safety reasons, as permitted under the law (such as adhering to applicable statutes of limitations or regulatory investigations).

We may also retain anonymized data, aggregated with other anonymized information, for analytics, research, or other business purposes.

8. Your rights

Summary: You can exercise specific rights (such as right to grievance redressal, right to withdraw consent, etc.) with regards to the processing of your Personal Data that we hold, by writing to us at info@satleolabs.com.

We are committed to protecting your Personal Data and ensuring your rights in relation to processing of your Personal Data are respected in accordance with applicable data protection laws. Here we want to make you aware of those rights:

| Your rights | Details |
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| Right to access information about your Personal Data | You have the right to request access to your Personal Data that we possess about you. |
| Right to seek correction and erasure of Personal Data: | If you believe that the Personal Data we hold is inaccurate, incomplete or outdated, you can request that we correct or update such Personal Data at our end. Please let us know the details of any inaccuracies and explain to us how we should correct it by contacting us at our customer support channels or the contact details provided in this Privacy Policy. You may also request deletion of your data; however, in certain cases, we may need to retain it for legal or regulatory reasons (See Clause 7 (How long we store your data) above). |
| Right to Grievance Redressal | If you have concerns about how we process your data or if you wish to file a grievance, you may contact our Data Protection Officer / Grievance Redressal Officer at ranendu@satleolabs.com . If your grievance remains unresolved, please be informed that you have the right to escalate it to the competent supervisory authority or Data Protection Board under the Digital Personal Data Protection Act 2023. |
| Right to Nominate | You have the right to designate another individual to exercise your rights under this Privacy Policy on your behalf in the event of your death or incapacity. Contact us at viral@satleolabs.com to make such a nomination. |
| Right to Withdraw Consent | If we are processing your Personal Data based on your consent, you may withdraw your consent at any time. Please note that withdrawing consent may affect the services we are able to provide to you. Should you do so, you may not be able to access some of the features or services of our Platform. |

To exercise any of these rights or seek further information, please write to us at info@satleolabs.com. We may require verification of your identity before we process your request. We reserve the right to not respond to complaints that are manifestly false, unfounded, or frivolous. Additionally, these rights may be limited in certain cases where we are legally required to process or retain your personal data.

9. How we protect your personal data?

Summary: We take the security of your Personal Data very seriously and use strict procedures to protect it. Whenever we process your Personal Data, we ensure that reasonable technical and organisational safeguards are in place to protect your Personal Data.

We are committed to ensure the security of your Personal Data that we collect and store, and protect it against any unauthorised access, alteration, disclosure, or destruction. We adopt following measures to protect your Personal Data based on the type and sensitivity of the data:

- (a) **Technical and Organisational Measures:** We implement a range of security measures to protect your personal data from loss, misuse, unauthorized access, and alteration. These measures include both technical and organizational safeguards for your Personal Data.
- (b) **Restricted Access:** Access to your personal data is limited to our employees, agents, contractors, and third parties who have the need to know to perform their business functions. They are required to follow our instructions and keep your Personal Data confidential while processing it (*See Clause 7 (How long we store your data) above*).
- (c) **No Unauthorized Sharing:** We do not rent, trade, or share your Personal Data with any third party for marketing purposes without your consent. We will only disclose your data to third parties without your consent if required under the applicable law.

While we strive to protect your data, please be aware that no system can guarantee absolute 100% security. Any transmission of your Personal Data is at your own risk, and we cannot ensure complete protection against unauthorized access by third parties. We encourage you to contact us if you have any concerns, need assistance or suspect any unauthorized activity on our Platform in relation to your Personal Data.

10. Third Parties and Links

Summary: Our Platform may offer products, services or links from affiliates, business partners or third parties. Their independent privacy policies will be applicable to processing of your Personal Data when you choose to use their offerings.

Our Platform may include additional products or services provided by our affiliates or business partners, and we'll make it clear when a product or service is offered by a business partner. If you choose to use their products or services via our Platform, the Personal Data shared with them will be governed by their own terms and privacy policies, not this Privacy Policy.

Additionally, our Platform may also contain links to external websites or third-party platforms that are not under our control. Please note that this Privacy Policy does not apply to such third-party links, websites or services. These websites may have their own privacy policies, and we are not responsible for the content, activities, or services on these linked sites, including any subcontractors they may use. Accessing such websites is at your own risk, and we recommend reviewing their privacy policies to understand how they manage your data.

11. Cookies and other tracking technologies

Summary: We use cookies and similar tracking technologies to enhance your experience, improve our services, and understand how you engage with our content. Cookies help us remember your preferences, track trends, and enable faster logins. You can control cookies through your browser settings, but disabling them may limit your use of certain features or services on our Platform.

We use cookies and similar tracking technologies to enhance your experience on our Platform, improve our services, and better understand how you interact with our content. Cookies are small data files stored on your device via your web browser when you access our Platform. These files help us identify your preferences, track trends, and enable faster logins, among other purposes. They collect data such as your IP address, browser type, and device type (e.g., PC, smartphone), and help us identify you on your subsequent visits to our Platform and tailor our offerings and services to your interests.

You can control how cookies are used through your browser settings, where you can disable or delete all or some cookies. However, disabling or rejecting cookies may limit your access to all or certain features of our Platform or services for which require the use of cookies.

12. How to contact us?

Summary: *You can address any questions, comments, complaints or requests regarding this Privacy Policy to the Grievance Redressal Officer/Data Protection Officer at ranendu@satleolabs.com.*

You may contact us on any aspect of this Privacy Policy or for any discrepancies / grievances with respect to your Personal Data you provided to Satleo, by contacting our Grievance Redressal Officer/Data Protection Officer as set out below:

Name: Dr. Ranendu Ghosh

Email: ranendu@satleolabs.com

Address: B8/1003, La Marina, Adani Shantigram, Nr. Vaishnovdevi Temple, S.G. Highway, Adalaj, Gandhi Nagar, Gujarat, India, 382421

13. Updates to this Privacy Policy

Summary: *We reserve the right to alter or revise this Privacy Policy at any point of time to account for changes in applicable law, our data collection and usage practices, the functionalities of the Platform, or business interests.*

Satleo may modify, add, or remove portions of this Privacy Policy, at its sole discretion. We will make reasonable efforts to notify you of any material changes via notifications, SMS or email. Once the revised Privacy Policy is published on the Platform, the changes will take effect immediately unless stated otherwise. Your continued use of our Platform after such update constitutes consent to the updated notice to the extent permitted by law. Please take the time to periodically review this Privacy Policy for the latest information on our privacy practices.