

Privacy Policy

We, **Oditly** (hereinafter referred to as the “**Company**”) having its registered office at “Huddle-Ground Floor, Tower B, Building No. 5, Epitome, DLF Cyber City, Gurugram-122001, Haryana, India”, and corporate office at “531A, Upper Cross Street, #04-95, Hong Lim Complex, Singapore, 051531”, represented by its members, where such expression shall, unless repugnant to the context thereof, be deemed to include its respective legal heirs, representatives, administrators, permitted successors and assigns.

The creator of this Privacy Policy ensures a steady commitment to Your privacy concerning the protection of your invaluable information. This privacy policy contains information about the web platform “www.oditly.com” and the associated Oditly mobile applications (hereinafter collectively referred to as the “**Platform**”)

To provide You with the uninterrupted use of the Platform, We may collect and, in some circumstances, disclose information about you with your permission. To ensure better protection of Your privacy, We provide this notice explaining Our information collection and disclosure policies, and the choices You make about the way Your information is collected and used.

ANY CAPITALIZED WORDS USED HENCEFORTH SHALL HAVE THE MEANING ACCORDED TO THEM UNDER THIS AGREEMENT. FURTHER, ALL HEADING USED HEREIN ARE ONLY FOR THE PURPOSE OF ARRANGING THE VARIOUS PROVISIONS OF THE AGREEMENT IN ANY MANNER. NEITHER THE USER NOR THE CREATORS OF THIS PRIVACY POLICY MAY USE THE HEADING TO INTERPRET THE PROVISIONS CONTAINED WITHIN IT IN ANY MANNER.

This Privacy Policy shall be in compliance with the General Data Protection Regulation (GDPR) in effect from May 25, 2018, and any and all provisions that may read to the contrary shall be deemed to be void and unenforceable as of that date. If you do not agree with the terms and conditions of our Privacy Policy, including in relation to the manner of collection or use of your information, please do not use or access the Site. If you have any questions or concerns regarding this Privacy Policy, you should contact our Customer Support Desk at info@oditly.com

Definitions

- a. *“We”, “Our”, and “Us”* shall mean and refer to the Platform and/or the Company, as the context so requires.
- b. *“You”, “Your”, “Yourself”, “User”*, shall mean and refer to natural and legal Users who use the Platform and who are competent to enter into binding contracts.
- c. *“Third Parties”* refer to any Platform, company or individual apart from the User, and the creator of this Platform.
- d. *“Platform”* refers to the Website/Domain and the mobile applications created by the Company which provides services of the Company through the use of the Platform.
- e. *“Personal Information”* shall mean and refer to any personally identifiable information that We may collect from You.

Information we collect and control

We are committed to respecting Your online privacy. We further recognize Your need for appropriate protection and management of any Personal Information You share with us. We may collect the following information:

- a. Personal data, such as, but not limited to,
 - i. Name
 - ii. Company Details
 - iii. Password
 - iv. Email Id
 - v. Phone Number
 - vi. Transactional details such as payment and financial related data
- b. Tracking Information such as, but not limited to the IP address of your device and Device ID when connected to the Internet. This information may include the URL that you just came from (whether this URL is on the Platform or not), which URL you next go to (whether this URL is on the Platform or not), your computer or device browser information, and other information associated with your interaction with the Platform;
- c. Details of Platform usage for analytics.

This privacy policy also applies to data we collect from users who are not registered as members of this Platform, including, but not limited to, browsing behaviour, pages viewed etc.

We also collect and store personal information provided by You from time to time on the Platform. We only collect and use such information from you that we consider necessary for achieving a seamless, efficient and safe experience, customized to your needs including:

- a. To enable the provision of services opted for by you;
- b. To enable the viewing of the content of your interest;
- c. To communicate the necessary account and service related information from time to time;
- d. To allow you to receive quality customer care services and data Collection;
- e. To comply with applicable laws, rules and regulations;

What we do with your information

We use your information to provide the services you've requested, create and maintain your accounts, and keep an eye out for unauthorized activity on your accounts. We also use it to communicate with you about the products and services you are currently using, your customer support requests, new products you may like, chances for you to give us feedback, and policy updates. We analyze the information we collect to understand user needs and to improve our websites and services.

We are required to have a legal basis for collecting and processing your information. We either have your consent or need the information to provide the service you've requested from us. You can decline certain kinds of information use either by not providing the information in the first place or by opting out later. You can also disable cookies to prevent your browser from giving us information, but if you do so, certain website features may not work properly.

The European Economic Area (EEA) provides certain rights to data subjects (including access, rectification, erasure, restriction of processing, data portability, and the right to object and to complain).

We keep your personal information for as long as it is required for the purposes stated in this Privacy Policy. When we no longer have a legitimate need to process your information, we will delete, anonymize, or isolate your information, whichever is appropriate.

Purposes for using information

The information provided by you shall be used to provide and improve the service for you and all users.

- a. For maintaining an internal record.
- b. For enhancing the Services provided
- c. For engaging interactions

For more details about the nature of such communications, please refer to our Terms of Service. Further, your data and Sensitive Personal data may be collected and stored by Us for internal record.

We use Your tracking information such as IP addresses, and or Device ID to help identify you and to gather broad demographic information and make further services available to you.

We will not sell, license or trade Your personal information. We will not share your personal information with others unless they are acting under our instructions or we are required to do so by law.

Information collected via Our server logs includes users' IP addresses and the pages visited; this will be used to manage the web system and troubleshoot problems. We also use third-party analytics, tracking, optimization and targeting tools to understand how users engage with our Platform so that we can improve it and cater personalized content/ads according to their preferences.

Information we process

Information provided in connection with services: You may entrust information that you or your organization (“you”) control, in connection with the use of our services or for requesting technical support for our products.

This includes information regarding your customers and your employees or data that you hold and use on behalf of another person for a specific purpose, such as a customer to whom you provide services. The data may either be stored on our servers when you use our services or transferred or shared to us as part of a request for technical support or other services.

If you are in the European Economic Area and you believe that someone has entrusted your information to us for processing (for instance, your employer or a company whose services you use), you can request certain actions from us regarding your data. To exercise those data rights,

please contact the person or company that entrusted the data to us and we will work with them on your request.

Legal bases for collecting and using information

Legal processing: If you are an individual from the European Economic Area (EEA), our legal basis for information collection and use depends on the personal information concerned and the context in which we collect it. Most of our information collection and processing activities are typically based on

- (i) contractual necessity,
- (ii) one or more of our legitimate interests or a third party that is not overridden by your data protection interests, or
- (iii) your consent.

Sometimes, we may be legally required to collect your information or may need your personal information to protect your vital interests or those of another person.

Withdrawal of consent: Where we rely on your consent as the legal basis, you have the right to withdraw your consent at any time, but this will not affect any processing that has already taken place.

Legitimate interests notice: Where we rely on legitimate interests as the legal basis and those legitimate interests are not specified above, we will clearly explain to you what those legitimate interests are at the time that we collect your information.

Your choice in information use

Opt-out of non-essential electronic communications: You may opt-out of receiving newsletters and other non-essential messages by using the ‘**unsubscribe**’ function included in all such messages. However, you will continue to receive notices and essential transactional emails.

Disable cookies: You can disable browser cookies before visiting our websites. However, if you do so, you may not be able to use certain features of the websites properly.

Optional information: You can choose not to provide optional profile information such as your photo. You can also delete or change your optional profile information. You can always choose not to fill in non-mandatory fields when you submit any form linked to our websites.

Information We share with Third Party

Third-party: To provide services and technical support for our products and other services from the platform, the Company may engage third-party service providers.

Employees and independent contractors: We may provide access to your service data to our employees and individuals who are independent contractors engaged with our Company or Platform and are involved in providing the services (collectively our “*personnel*”) so that they can (i) identify, analyze and resolve errors, (ii) manually verify emails reported as spam to improve spam detection, or (iii) verify scanned images that you submit to us to verify the accuracy of optical character recognition.

We ensure that access by our personnel to your service data is restricted to specific individuals, and is logged and audited. Our personnel will also have access to data that you knowingly share with us for technical support or to import data into our products or services. We communicate our privacy and security guidelines to our personnel and strictly enforce privacy safeguards within the Company.

Collaborators and other users: Some of our products or services allow you to collaborate with other users or third parties. Initiating collaboration may enable other collaborators to view some or all of your profile information. For example, when you edit a document that you have shared with other persons for collaboration, your name and profile picture will be displayed next to your edits to allow your collaborators to know that you made those edits.

Third-party integrations you have enabled: Most of our products and services support integrations with third-party products and services. If you choose to enable any third-party integrations, you may be allowing the third party to access your service information and personal information about you. We encourage you to review the privacy practices of the third-party services and products before you enable integrations with them.

Your rights concerning the information we hold about you as a controller

If you are in the European Economic Area (EEA), you have the following rights concerning information that you have provided to us through our Platform.

1. *Right to access:* You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information's

source, purpose and period of processing, and the persons to whom the information is shared

2. *Right to rectification*: You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.
3. *Right to erasure*: You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.
4. *Right to restriction of processing*: You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
5. *Right to data portability*: You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.
6. *Right to object*: You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.
7. *Right to complain*: You have the right to complain to the appropriate supervisory authority if you have any grievance against the way we collect, use or share your information.

Cookies

We use data collection devices such as “cookies” on certain pages of our Websites. “Cookies” are small files sited on your hard drive that assist us in providing customized services. We also offer certain features that are only available through the use of a “cookie”. Cookies can also help us provide information which is targeted to your interests. Cookies may be used to identify logged in or registered users. Our Website uses session cookies to ensure that you have a good experience. These cookies contain a unique number, your 'session ID', which allows our server to recognize your computer and 'remember' what you've done on the site. The benefits of this are:

- a. You only need to log in once if you're navigating secure areas of the site
- b. Our server can distinguish between your computer and other users, so you can see the information that you have requested.

You can choose to accept or decline cookies by modifying your browser settings if you prefer. This may prevent you from taking full advantage of the Website. We also use various third-party cookies for usage, behavioural, analytics and preferences data. The following are the different types of cookies used on the Website:

- a. **Authentication cookies:** To identify the user and share the content that he or she requested.
- b. **Functionality cookies:** For the customized user experience and resuming past course progress.
- c. **Tracking, optimization, and targeting cookies:** To capture usage metric on the device, operating system, browser, etc. To capture behavioural metrics for better content delivery. To cater and suggest most suited preferences.

Google Analytics

We use Google Analytics to help us to understand how you make use of our content and work out how we can make things better. These cookies follow your progress through us, collecting anonymous data on where you have come from, which pages you visit, and how long you spend on the site. This data is then stored by Google to create reports. These cookies do not store your data.

The information generated by the cookie about your use of the Website, including your IP address, may be transmitted to and stored by Google on servers in the United States. Google may use this information to evaluate your use of the website, compiling reports on website activity for us and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. The Google website contains further information about Analytics and a copy of Google's privacy policy pages.

Privacy Policy for California Residents

This Privacy Policy for California Residents is an adaptation of the general Privacy Policy for compliance with the California Consumer Privacy Act ("CCPA").

Information we collect and process for providing services to you

Categories of Personal Information		Collection
		Do we collect?
A	Identifiers	Yes
B	Categories of PI described in Section 1798.80(e)	No
C	Characteristics of protected classifications under California or federal law	No
D	Commercial information	Yes
E	Biometric information	No
F	Internet or other electronic network activity information	Yes
G	Geolocation data	Yes
H	Audio, visual or similar information	Yes
I	Professional or employment-related information	No
J	Non-public education information (as per the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99))	No
K	Inferences are drawn from other personal information to create a profile about a consumer.	No

Your rights concerning your information we have access to

You have the following rights concerning information that you provide to us and we have access too.

- i. *Right to access:* You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the

information's source, purpose and period of processing, and the persons to whom the information is shared.

- ii. Right to rectification:* You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.
- iii. Right to erasure:* You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.
- iv. Right to restriction of processing:* You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- v. Right to data portability:* You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.
- vi. Right to object:* You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.

Your rights under CCPA

CCPA provides you five rights (1) right to notice, (2) right to access, (3) right to opt-out (or right to opt-in), (4) right to request deletion, and (5) right to equal services and prices, of which two are covered as part of the rights listed above. These two are right to access personal information and the right to request the deletion of personal information.

The third is the right to opt-out of sale, which is redundant since we promise not to sell or monetize your data in any way. The fourth right available to you under CCPA is the right against discrimination because you exercised the rights available to you and the fifth is the right to protection against waiver of rights.

You can exercise the rights described above, by sending an email to info@oditly.com. Only you, or an agent authorized to request on your behalf, may make a request related to your personal information.

To respond to your request, we will verify your identity and the data shared through your request. The same shall be looked into and responded within 45 days of its receipt.

How secure is your information

We as a responsible Company and to ensure that your data is safe, we consider data security to be our utmost concern at all times. We have been certified by specialists in the market for industry standards. We have taken steps to implement appropriate administrative, technical & physical safeguards to prevent unauthorized access, use, modification, disclosure or destruction of the information you entrust to us. If you have any concerns regarding the security of your data, we encourage you to write to us at info@oditly.com.

Retention of information

As a responsible platform, we retain your personal information for as long as it is required for the purposes stated in this Privacy Policy. Sometimes, we may retain your information for longer periods as permitted or required by law, such as to maintain suppression lists, prevent abuse, if required in connection with a legal claim or proceeding, to enforce our agreements, for tax, accounting, or to comply with other legal obligations. When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion is possible.

Data Protection Officer

We have appointed a Data Protection Officer to oversee our management of your personal information following this Privacy Policy. If you have any questions or concerns about our privacy practices concerning your personal information, you can reach out to our Data Protection Officer by sending an email to info@oditly.com.

External links

Our platforms may contain links to websites that are not linked to this Privacy Policy. If you submit your personal information to any of these third-party sites, your personal information is governed by their privacy policies. As a safety measure, we recommend that you not share any personal information with these third parties unless you've checked their privacy policies

and assured yourself of their privacy practices.

Social media widgets

Our Platforms include social media widgets such as Facebook "like" buttons and Twitter "tweet" buttons that let you share articles and other information. These widgets may collect information such as your IP address and the pages you navigate through the platform and may set a cookie to enable the widgets to function properly. Your interactions with these widgets are governed by the privacy policies of the companies providing them.

Blogs and forums

The Company may offer publicly accessible blogs and forums on the platforms. As a User, we request you to be aware that any information you provide on these blogs and forums may be used to contact you with unsolicited messages. We urge you to be cautious in disclosing personal information in our blogs and forums. Neither the Company nor the Platform is not responsible for the personal information you elect to disclose publicly. Your posts and certain profile information may remain even after you terminate your account with the platform. To request the removal of your information from our blogs and forums, you can contact us at info@oditly.com

Push notifications

If you have enabled notification on any of our Platforms, we will push notifications through a push notification provider such as Apple Push Notification Service, Google Cloud Messaging or Windows Push Notification Services. You can manage your push notification preferences or deactivate these notifications by turning off notifications in the application or device settings.

Do Not Track (DNT) requests

Some internet browsers have enabled 'Do Not Track' (DNT) features, which send out a signal (called the DNT signal) to the Platform that you visit indicating that you don't wish to be tracked. Currently, no standard governs what websites can or should do when they receive these signals. For now, we do not take action in response to these signals.

Our Rights

As a responsible platform, we may disclose personal information and service data to a third

party if we believe that such disclosure is necessary for preventing fraud, investigating any suspected illegal activity, enforcing our agreements or policies, or protecting the safety of our users.

We may be required by law to preserve or disclose your personal information and service data to comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements.

Compliance with this Privacy Policy

We make every effort, including periodic reviews, to ensure that the personal information you provide is used in conformity with this Privacy Policy. If you have any concerns about our adherence to this Privacy Policy or how your personal information is used, kindly write to us info@oditlv.com.

We'll contact you, and if required, coordinate with the appropriate regulatory authorities to effectively address your concerns.

Notification of changes

We may modify the Privacy Policy at any time and may notify you through a service announcement or by sending an email to your primary email address provided on our platform. If we make significant changes to the Privacy Policy that affect your rights, you will be provided with at least 30 days' advance notice of the changes by email to your primary email address. If you think that the updated Privacy Policy affects your rights concerning your use of our products or services, you may terminate your use by sending us an email within 30 days.

Note: Your continued use after the effective date of changes to the Privacy Policy will be deemed to be your agreement to the modified Privacy Policy.