

## **PRIVACY POLICY**

**EFFECTIVE DATE: [10/07/2022]**

**LAST REVISED ON: [10/07/2022]**

### **1. OVERVIEW**

We believe in openness and privacy therefore at Ahuja Valecha & Associates LLP, (“**Company**” or “**we**” or “**us**”), your privacy is of paramount importance, we respect your privacy and are committed to protecting it through our compliance with this policy.

This Privacy Policy explains our online and offline information practices, the kind of information we may collect, how we intend to use and share that information, and how you can opt-out of a use or correct or change such information. All capitalized terms not defined herein will have in the meanings set forth in the Terms.

Please take a moment to review this Privacy Policy, which governs the use of the Ahuja Valecha & Associates LLP website. By using our website, you agree to the Ahuja Valecha & Associates LLP Terms and Conditions, including definitions, and this Privacy Policy.

If you do not agree with the terms of this Privacy Policy, please do not use this website.

### **2. SCOPE**

This Privacy Policy applies to Personal Information that is collected by, processed by us in the course of our business, including on our website, <https://www.ahujavalecha.in> (“**Website**”), web applications (“**App**”), forums, blogs, and other online or offline offerings (collectively, the “**Services**”). Anytime we use the word Website, it is deemed to include our App as well. All individuals whose responsibilities include the processing of personal information on behalf of the Company are expected to protect that data by adherence to this Privacy Policy. This Privacy Policy is intended to meet requirements globally.

#### **Children Under the Age of 18**

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any information to us or access the Website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website or through any of its features or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete, anonymize that information and terminate the user account. If you believe we might have any information from or about a child under 18, please contact us at [info@avallp.in](mailto:info@avallp.in).

### **3. TRANSPARENCY/NOTICE - TYPES OF PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT**

Some of the ways that the Company may collect personal information include:

- You may provide personal information directly to the Company through registering on our Website, when you use the features on our Website, during the course of providing Services to you by us, interacting with the Services, participating in surveys, and

requesting Services, or information and when you provide your personal information to us.

- As you navigate the Services, certain passive information may also be collected about your visit, including through cookies and similar technologies as described below.

We endeavor to collect only that information which is relevant for the purposes of providing the Services to you. Below are the ways we collect personal information and how we use it.

### 3.1 TYPES OF PERSONAL INFORMATION WE COLLECT

Company collects Personal Information regarding its current, prospective, and former clients, customers, users, visitors, and guests (collectively “**Individuals**”).

- **Information You Provide Directly to Us.** When you use the Services or engage in certain activities, such as registering for an account with Company on our Website, responding to surveys, requesting Services or information, or contacting us directly, we may ask you to provide some or all of the following types of information:

- First and last name,
- Birth date/age,
- Gender,
- Social Security Number,
- Race or colour,
- Ancestry or national origin,
- Religion or creed,
- Mental or physical disability,
- Sexual orientation,
- Marital status,
- If you have biometric authentication integration as part of the Services, then we may collect information concerning Your fingerprints, faceprints, and voiceprints, and iris or retina scans,
- Address (including country and pin/postal code),
- Phone number/mobile number,
- Email address,
- Title and department,
- Company name,
- Financial information,
- Military and veteran status,
- Information provided on your resume, such as your education and employment experience, if you apply through LinkedIn, then we collect information you made available to us on LinkedIn,
- Technical information,
- Your pictures or videos that you may provide,

- Professional contact details of employees and other individuals associate with our business,
- Login ID and password,
- Shipping information,
- User details as provided at the time of registration or thereafter,
- Records of interaction with the Company representatives,
- Your usage details such as time, frequency, duration and pattern of use, features used and the amount of storage used,
- Master and transaction data and other data stored in Your user account,
- Internet Protocol address, browser type and version, browser language, referring URL, files accessed, errors generated, time zone, operating system and platform and other visitor details collected in Our log files,
- Browser history, search history, information on a consumer's interaction with a website, application or advertisement,
- Any other information that is willingly shared by You

(collectively referred to as "**Personal Information**").

- **Communications with Us.** We may collect personal information from you such as email address, phone number or mailing address, your picture or videos that you may provide, when you choose to request information about our Services, register for Company's newsletter, request to receive customer or technical support, or otherwise communicate with us.
- **Surveys.** From time to time, we may contact you to participate in online surveys. If you do decide to participate, you may be asked to provide certain information which may include Personal Information. All information collected from your participation in our surveys is provided by you voluntarily. We may use such information to improve our products, Sites and/or services and in any manner consistent with the policies provided herein.
- **Posting on the Services.** Company may offer publicly accessible pages, blogs, private messages, or community forums. You should be aware that, when you disclose information about yourself in on Company's pages, blogs, private messages, and community forums, the Services will collect the information you provide in such submissions, including any personal information. If you choose to submit content to any public area of the Services, such content will be considered "public" and will not be subject to the privacy protections set forth herein.
- **Automatic Data Collection.** We may collect certain information automatically through our Services or other methods of web analysis, such as your Internet protocol (IP) address, cookie identifiers, mobile carrier, mobile advertising identifiers, MAC address, IMEI, Advertiser ID, and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type and language, geo-location information, hardware type, operating system, Internet service provider, pages that you visit before and after using the Services, the date and time of your visit, the amount of time you spend

on each page, information about the links you click and pages you view within the Services, and other actions taken through use of the Services such as preferences.

- **Cookies.** We use different technologies to collect information, including cookies and web beacons. Cookies are small text files placed in visitors' device browsers to store their preferences that can be recalled by a web server in the domain that placed the cookie. Whereas, web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness. When you use our Website, we may automatically collect information about your visit, including via cookies, beacons, invisible tags, and similar technologies (collectively, "**cookies**") in your browser and on emails sent to you. This information may include Personal Information, such as your IP address, web browser, device type, and the web pages that you visit just before or just after you use the Website, as well as information about your interactions with the Websites, such as the date and time of your visit, and where you have clicked. Metrics collected by automated means may include: number of users; daily/weekly/monthly active users; rebuild frequency; rebuild time; image update frequency; editor usage split by editor type; web terminal, coder-cli, and SSH usage; metrics page and filter usage; services usage; devurl usage patterns; and resource allocation. Paid users may opt in to the collection of this information to enhance product performance but are otherwise opted out by default. Free users are automatically opted in to the collection of this information and they do not have an opt out option. In the event a free user converts to a paid subscription, they will be given the option to opt out. This information is only used for product development and enhancement. You can find more information about how we use cookies in the section 3.2 below.
- **Information Submitted Via Services.** You agree that Company is free to use the content of any communications submitted by you via the Services, including any ideas, inventions, concepts, techniques, or know-how disclosed therein, for any purpose including developing, manufacturing, and/or marketing goods or Services. Company will not release your name or otherwise publicize the fact that you submitted materials or other information to us unless: (a) you grant us permission to do so or it is otherwise necessary as part of the Services, such as to facilitate payment to you as a Pentester; (b) we first send notice to you that the materials or other information you submit to a particular part of a Service will be published or otherwise used with your name on it; or (c) we are required to do so by law.
- **Information from Other Sources.** We may receive information, including Personal Information about you from other sources, including through third-party services and organizations to supplement information provided by you. For example, if you access or use our Services through a third-party application, we may collect information about you from that third-party application that is public via your privacy settings or is otherwise available. This supplemental information allows us to verify information that you have provided to Company and to enhance our ability to provide you with information about our business, products, and Services. If you authorize us to collect

information from a third party, or if you authorize a third party to send us information, and you later decide that you no longer want us to obtain that information, you may need to contact the third-party source directly and request that they stop transmitting information to us.

### **3.2 HOW COMPANY USES YOUR INFORMATION**

We acquire, hold, use, and process personal information about Individuals for a variety of business purposes, including:

**To Provide Products, Services, or Information Requested.** Your Personal Information may be used for various purposes including but not limited to the following:

- To operate and improve the Website;
- To provide technical support, including diagnosing and resolving any issues you report;
- To provide effective Services;
- For customer relationship management purposes;
- To perform studies, research and analysis for improving Our information, analysis, services and technologies; and ensuring that the content and advertising displayed are customized to Your interests and preferences;
- To contact You via phone, sms, whatsapp, email, etc. for appointments, technical issues, payment reminders, administrative purposes such as to manage your account, to provide information that you request and other security announcements;
- To send promotional mailings from Us or any of Our partners via sms, whatsapp, email or snail mail;
- To advertise products and Services of the Company and third parties;
- To transfer information about You if we are acquired by or merged with another company;
- To share with our business partners for provision of specific services you have ordered so as to enable them to provide effective services to You;
- To administer or otherwise carry out Our obligations in relation to any agreement You have with us;
- To build your profile on the Website;
- To maintain and develop our business systems, including testing and upgrading of these systems;
- To manage staff training and quality assurance;
- To respond to subpoenas, court orders, or legal process, or to establish or exercise Our legal rights or defend against legal claims, including but not limited to intellectual property infringements, defamation, or privacy rights;
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of our Terms of Use, breach of Our agreement with you or as otherwise required by law;
- To aggregate Personal Information for research, statistical analysis and business intelligence purposes, and to sell or otherwise transfer such research, statistical or

intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates;

- Generally, manage Individual information and accounts;
- To administer fees and provide You with invoices or resolve billing issues. We may use your information to verify your identity in order to process your payments;
- Respond to questions, comments, and other requests;
- To assess vulnerabilities and other bugs you discover in the course of your use of the Services;
- Provide access to certain areas, functionalities, and features of Company's Services;
- Contact you to answer requests for customer support or technical support; and
- Allow you to register for events.

(referred to as "**Purpose(s)**")

**Administrative Purposes.** Company may use personal information about you for its administrative purposes, including to:

- Measure interest in Company's Services;
- Develop new products and Services;
- Ensure internal quality control;
- Verify Individual identity;
- Communicate about Individual accounts and activities on Company's Services and systems, and, in Company's discretion, changes to any Company policy;
- Send email to the email address you provide to us to verify your account and for informational and operational purposes, such as Account management, customer service, or system maintenance;
- Process payment for products or services purchased;
- Process applications and transactions;
- Prevent potentially prohibited or illegal activities;
- Enforce our Terms.

**Marketing Company Products and Services.** Company may use personal information to provide you with materials about offers, products, and Services that may be of interest, including new content or Services. Company may provide you with these materials by phone, postal mail, facsimile, or email, as permitted by applicable law. Such uses include:

- To tailor content, advertisements, and offers;
- To notify you about offers, products, and services that may be of interest to you;
- To provide Services to you and our sponsors;
- For other purposes disclosed at the time that Individuals provide personal information; or

- Otherwise with your consent.

You may contact us at any time to opt-out of the use of your personal information for marketing purposes, as further described in Section 5 below

- **Research and Development.** Company may use personal information alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing products and Services or develop new products and Services.
- **Direct Mail, Email and Outbound Telemarketing.** Individuals who provide us with personal information, or whose personal information we obtain from third parties, may receive periodic emails, newsletters, mailings, or phone calls from us with information on Company's or our business partners' products and services or upcoming special offers/events we believe may be of interest. We offer the option to decline these communications at no cost to the Individual by following the instructions in Section 5 below.
- **Services via Mobile Devices.** From time to time, Company may provide Services that are specifically designed to be compatible and used on mobile devices. Company will collect certain information that your mobile device sends when you use such Services, like a device identifier, user settings, location information, mobile carrier, and the operating system of your device. Mobile versions of Company's Services may require that users log in with an account. In such cases, information about use of mobile versions of the Services may be associated with accounts. In addition, Company may enable Individuals to download an application, widget, or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. These tools may transmit personal information to Company to enable Individuals to access accounts and to enable Company to track use of these tools. Some of these tools may enable users to email reports and other information from the tool. Company may use personal or non-identifiable information transmitted to Company to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices Company provides.
- **De-Identified and Aggregated Information Use.** Company may use personal information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access Company's Services, or other analyses we create. Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors' interest in and use of various portions or features of the Services. De-identified and/or aggregated information is not personal information, and Company may use such information in a number of ways, including research, internal analysis, analytics, and any other legally permissible purposes. We may share this information within Company and with third parties for our or their purposes in an de-identified and/or aggregated form that is designed to prevent anyone from identifying you
- **Sharing Content with Friends or Colleagues.** Company's Services may offer various tools and functionalities to share content. Our referral services may allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Email addresses that you may provide for a friend or

colleague will be used to send your friend or colleague the content or link you request but will not be collected or otherwise used by Company or any other third parties for any other purpose.

- **Other Uses.** Company may use Personal Information for which we have a legitimate interest, such as network and information security, direct marketing, disclosure to affiliated organizations, research (including marketing research), fraud prevention, or any other purpose disclosed to you at the time you provide personal information or with your consent.

**Uses of Automatic Collection Technologies.** Our use of the Technologies fall into the following general categories:

- **Operationally Necessary.** We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our sites, services, applications, and tools. This includes technologies that allow you access to our sites, services, applications, and tools; that are required to identify irregular site behavior, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping-carts, saved search, or similar functions;
- **Performance Related.** We may use cookies, web beacons, or other similar technologies to assess the performance of our websites, applications, services, and tools, including as part of our analytic practices to help us understand how our visitors use our websites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, services, or tools;
- **Functionality Related.** We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our sites, services, applications, or tools. This may include identifying you when you sign into our sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites;
- **Advertising or Targeting Related.** We may use first-party or third-party cookies and web beacons to deliver content, including ads relevant to your interests, on our sites or on third party sites. This includes using technologies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as whether you have clicked on an advertisement.

If you would like to opt-out of the Technologies we employ on our Services, you may do so by blocking, deleting, or disabling them as your browser or device permits.

### **3.3 THIRD-PARTY WEBSITES AND SOCIAL MEDIA PLATFORMS**

**Social Media Platform.** If you log in to our Services using your social media account (for example, Facebook or Google) we will receive relevant information that is necessary to enable our Services and authenticate you. The social media network will provide us with access to certain information that you have provided to them, including your name, profile image and e-mail address. We use such information, together with any other information you directly

provide to us when registering or using our Services, to create your account and to communicate with you about the information, products and services that you request from us. You may also be able to specifically request that we have access to the contacts in your social media account so that you can send a referral link to your family and friends. We will use, disclose and store all of this information in accordance with this Privacy Policy. The Services may contain links to other websites and other websites may reference or link to our Services. These other domains and websites are not controlled by us, and Company does not endorse or make any representations about third-party websites or social media platforms. We encourage our users to read the privacy policies of each and every website and application with which they interact. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

Company's Services may include publicly accessible blogs, community forums, or private messaging features. The Services may also contain links and interactive features with various social media platforms (e.g., widgets). If you already use these platforms, their cookies may be set on your device when using our Site or other Services. You should be aware that personal information which you voluntarily include and transmit online in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum may be viewed and used by others without any restrictions. We are unable to control such uses of your information when interacting with a social media platform, and by using such services you assume the risk that the personal information provided by you may be viewed and used by third parties for any number of purposes.

**Third-Party Service Providers.** The Services may include hyperlinks to, or include on or in connection with, the Services (e.g., apps, software, and plug-ins), websites, locations, platforms, applications or services operated by third parties ("Third-Party Service(s)"). These Third-Party Services may use their own cookies, web beacons, and other Tracking Technology to independently collect information about you and may solicit Personal Information from you. We advise you to review the privacy policies of the Third-Party Providers, but note that we have no control over and assume no responsibility for the content, privacy policies or practices of any Third-Party Providers, their sites or services.

Third Party Providers may include, but are not limited to, the following:

**Canopy.** You can learn about Canopy's privacy practices at [Privacy Policy | Canopy \(getcanopy.com\)](https://www.getcanopy.com/privacy-policy).

**We share information with government and regulatory authorities.** We share information with government and regulatory authorities in the course of providing services to you, such as preparation of tax returns.

**We share information if we must in order to comply with law or to protect our legal interests.** We may share information we collect about you to respond to a court order or subpoena. We may share information in response to a government agency or investigatory body request. This may include sharing information with the US government. We may share information if necessary to prevent physical harm or financial loss. We may share information we collect when we are investigating potential fraud or other illegal activity.

**We share information with any successor to all or part of our business.** If all or part of our business is sold, we will share information as a part of that transaction. If there is a merger or acquisition, we will also share your information. We will also share information as part of a financing or bankruptcy.

### **3.4 THIRD-PARTY PAYMENT PROCESSING**

If you use the Services to make, receive or facilitate payments in connection with the Services, we and Third-Party applications may collect certain financial information from you to process transactions, including your name, email address, address, financial account information and other billing information.

### **3.5 INCOMPLETE PERSONAL INFORMATION**

Where indicated (for example in registration/application forms), it is obligatory to provide your personal information to us to enable us to process your application for our Products and/or Services. Should you decline to provide such obligatory personal information, we may not be able to process your application or provide you with our Products and/or Services.

### **3.6 SOURCES OF COLLECTION OF PERSONAL INFORMATION**

We collect Personal Information from the following categories of sources:

- You/Your devices directly;
- Other users of our Services;
- Visit our offices;
- Affiliates;
- Government entities;
- Consumer data resellers;
- Business partners;
- Publicly accessible sources.

## **4. ONWARD TRANSFER—COMPANY MAY DISCLOSE YOUR INFORMATION**

### **4.1 INFORMATION WE SHARE**

We may share your information as described in this Privacy Policy (e.g., with our third-party service providers; to comply with legal obligations; to protect and defend our rights and property) or with your permission.

- **We Use Vendors and Service Providers.** We may share any information we receive with vendors and service providers. The types of service providers (processors) to whom we entrust personal information include service providers for: (i) provision of IT

and related services; (ii) provision of information and services you have requested; (iii) payment processing; (iv) customer service activities; and (v) in connection with the provision of the Services. Company has executed appropriate contracts with the service providers that prohibit them from using or sharing personal information except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements.

- **Business Partners.** Company may share personal information with our business partners, and affiliates for our and our affiliates' internal business purposes or to provide you with a product or service that you have requested. Company may also provide personal information to business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you. In such cases, our business partner's name will appear, along with Company. Company requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of personal information they maintain on our behalf and not to use it for any purpose other than the purpose for which Company provided them.
- **Content Visible to Others.** When you create a Profile or post content to the Services, this information may be displayed to others. We are not responsible for privacy practices of the other users who will view and use the posted information.
- **Marketing – Interest-Based Advertising and third-party Marketing.** Through our Services, Company may allow third-party advertising partners to set tracking tools (e.g., cookies) to collect information regarding your activities (e.g., your IP address, page(s) visited, time of day). We may also share such de-identified information as well as selected Personal Information (such as demographic information and past purchase history) we have collected with third-party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit non-Company related websites within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.” We may allow access to other data collected by the Services to facilitate transmittal of information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer that we do not share your personal information with third-party advertising partners, you may opt-out of such sharing at no cost by following the instructions in Section 5 below.
- **Disclosures to Protect Us or Others (e.g., as Required by Law and Similar Disclosures).** We may access, preserve, and disclose your personal information, other account information, and content if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect yours', ours' or others' rights, property, or safety; (iv) to enforce Company policies or contracts; (v) to collect amounts owed to Company; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if we, in good faith, believe that disclosure is otherwise necessary or advisable. In addition, from time to time, server logs may be reviewed for security purposes – e.g., to detect unauthorized activity on the Services. In such cases, server log data containing IP addresses may be

shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

- **Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such event, Company will endeavor to direct the transferee to use personal information in a manner that is consistent with the Privacy Policy in effect at the time such personal information was collected.

## 4.2 INTERNATIONAL DATA TRANSFERS

We operate international offices and have developed global data privacy and security practices designed to ensure that your personal data is appropriately handled and protected. All personal information collected via or by Company may be transferred, processed, accessed and stored anywhere in the world, including but not limited to, the United States, the European Union, in the cloud, on our servers, on the servers of our affiliates or the servers of our service providers in order to provide the Services. Your Personal Information may be accessible to law enforcement or other authorities pursuant to a lawful request. Where required by law, international transfers of personal information will be supported by an adequacy mechanism.

You authorize us to exchange, transfer, share, part with all or any of Your Personal Information, across borders and from your country to any other countries across the world with our affiliates / subsidiaries / agents / third party service providers / partners / banks and financial institutions for the Purposes specified under this Policy or as may be required by applicable law.

You acknowledge that some countries where we may transfer your Personal Information may not have data protection laws which are as stringent as the laws of your own country. You acknowledge that it is adequate that when the Company transfers Your Personal Information to any other entity within or outside Your country of residence, the Company will place contractual obligations on the transferee which will oblige the transferee to adhere to the provisions of this Privacy Policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of a site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We will implement appropriate technical and organisational measures to protect your data, taking into account the nature, scope, context and purpose of the processing and the risks involved in processing. Unfortunately, the transmission of information via the internet is not completely secure. Although we will seek to protect your personal data, we cannot guarantee the security of your data transmitted to a site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 5. YOUR CHOICES

### 5.1 GENERAL

You may have the right to object to and opt out of certain uses and disclosures of your Personal Information. Where you have consented to Company's processing of your Personal Information, you may withdraw that consent at any time. However, please note that such withdrawal of your consent does not affect the lawfulness of our processing activities based on consent before its withdrawal.

## **5.2 EMAIL AND TELEPHONE COMMUNICATIONS**

If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt-out of receiving future emails. We will process your request within a reasonable time after receipt. Note that you will continue to receive transaction-related emails regarding products or services you have requested. We may also send you certain non-promotional communications regarding Company and our Services and you will not be able to opt out of those communications (e.g., communications regarding updates to our Terms or this Privacy Policy). We will also send you technical notices, updates, security alerts, support and administrative messages. Please be aware that you cannot opt out of receiving certain service messages from us, including necessary security alerts and legal notices.

## **5.3 TURNING OFF COOKIES**

You can erase or choose to block cookies from your computer except for functional cookies that are strictly necessary to make our Website available to you. You can configure your computer's browser to alert you when we attempt to send you a cookie with an option to accept or refuse the cookie. Please note that if you have turned cookies off, you may be prevented from using certain features of the Website and might affect certain functionality on the Website.

## **6. YOUR PRIVACY RIGHTS**

Please be assured that we do not ever "sell" your Personal Information.

In accordance with applicable law, you may have the right to once a year, free of charge: (i) request confirmation of whether we are processing your Personal Information; (ii) obtain access to or a copy of your Personal Information; (iii) receive an electronic copy of Personal Information that you have provided to us, or ask us to send that information to another company (the "right of data portability"); (iv) restrict our uses of your Personal Information; (v) seek correction or amendment of inaccurate, untrue, incomplete, or improperly processed Personal Information; (vi) withdraw your consent and (vii) request erasure of Personal Information held about you by us, subject to certain exceptions prescribed by law.

Where otherwise permitted by applicable law, you may use any of the methods set out in this Privacy Policy to exercise your rights in Personal Information. Please include your full name, email address associated with your Account, and a detailed description of your data request. Such requests will be processed in line with applicable laws.

To protect your privacy, Company will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

In some cases, exercising the above rights may not be possible – there may be situations where we will continue to be authorized to process your personal data.

In order to execute any of the abovementioned rights please contact Us using one of the ways indicated at the beginning of this document.

## **7. DATA RETENTION**

Company retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws. When determining the specific retention period, we take into account various criteria, such as the type of service provided to you, the nature and length of our relationship with you, and mandatory retention periods provided by law and the relevant statute of limitations. At the end of that retention period, your data will either be deleted completely or anonymized, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

## **8. SECURITY OF YOUR INFORMATION**

The security of your Personal Information is important to us. We have adopted reasonable security practices and procedures including role-based access, password protection, encryption etc. to ensure that the Personal Information collected is secure. You agree that such measures are secured and adequate. We restrict access to your Personal Information to Our and Our affiliates' employees, agents, third party service providers, partners, and agencies who need to know such Personal Information in relation to the Purposes as specified above in this Policy and provided that such entities agree to abide by this Privacy Policy. Despite our efforts and diligence, unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure. We further disclaim all and any liability arising from false, misleading disclosures made by you.

By using the Services or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Services or sending an e-mail to you. You may have a legal right to receive this notice in writing.

## **10. CONTACT US**

### **10.1 COMPLAINTS**

If you have any questions about our privacy practices or this Privacy Policy or if You need to update or correct your Personal Information or have any grievance with respect to the processing or use of your Personal Information, for any reason, you may send updates and corrections to us at [info@avallp.in](mailto:info@avallp.in) and we will take all reasonable efforts to incorporate the changes within a reasonable period of time.

### **10.2 GRIEVANCE OFFICER**

We have appointed a Grievance Officer to address any concerns or grievances that You may have regarding the processing of Your Personal Information. If you have any such grievances, please write to our Grievance Officer at [hr@avallp.in](mailto:hr@avallp.in) and our officer will attempt to resolve Your issues in a timely manner.

## **11. CHANGES TO OUR PRIVACY POLICY AND PRACTICES**

Please note that some privacy rights and obligations may differ in certain locations based on local law, in which case We will comply with local legal requirements. We reserve the right, at any time, to modify this Privacy Policy. We will post a notification on our Website every time the Privacy Policy is changed and ask that you agree to the updated Privacy Policy every time there is a change. Each version of this Privacy Policy will be identified at the top of the page by its effective date. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you use the Services after the updated Privacy Policy is posted on the Services. You are advised to go through the updates and if at any point you do not agree to any portion of the Privacy Policy then in effect, you must immediately stop using the Services.

- **Revision to the Privacy Policy.** We may revise this Privacy Policy in our sole discretion, so review it periodically. If you continue to visit this Site and use the services made available to you after such changes have been made, you hereby provide your consent to the changes.
- **Posting of Revised Privacy Policy.** If there are any material changes to this Privacy Policy, Company will notify you by email or as otherwise required by applicable law. We will post any adjustments to the Privacy Policy on this web page, and the revised version will be effective immediately when it is posted (or upon notice as applicable). If you are concerned about how your information is used, bookmark this page and read this Privacy Policy periodically.
- **New Uses of Personal Information.** Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt-out. Where consent of the Individual for the processing of Personal Information is otherwise required by law or contract, Company will endeavor to comply with the law or contract.

You should review this Privacy Policy periodically so that you keep up to date on our most current policies and practices. You consent to any change or upon our posting of the new Privacy Policy on the Website.

Any interpretation associated with this Privacy Policy will be made by our legal counsel. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word “including” is used, it means “including without limitations”.

## **12. CONSENT**

- By clicking on the “I accept” button at the end of the page containing the Privacy Policy, Terms of Use or by providing us your Personal Information or by making use of the

facilities or Services provided by the Website, you hereby consent to the collection, storage, processing, disclosure and transfer of your Personal Information in accordance with the provisions of this Privacy Policy.

- You acknowledge that You are providing your Personal Information out of your free will.
- You acknowledge that documents & data uploaded by You to get Our services & results from Us is considered to be legally owned or permitted to You. The Company should not be held responsible for damages arising out of such data provided by You.
- You acknowledge that the Company has no obligation to monitor the documents, data, links or other materials that You provide. You are responsible for evaluating all your data including for accuracy, completeness and reliability, and you bear all risk of using such data. The Company will not be responsible for any damages that you may incur as a result of the submission or use of any such data.
- You acknowledge that we test and analyze certain new features with some users before rolling the feature out to all users.
- You acknowledge that links, data, documents or other materials provided by You does not contain illegal or pornographic activities.
- You acknowledge that Our Services is an automated tool, therefore the results will depend on the quality of input given by You. Thus, the Company shall not be held liable for the end result or of the utility of the code/software that is autogenerated from Our platform.
- If you are providing Personal Information on behalf of a third party, then you hereby undertake and confirm that you have the legal authority to do so and to agree to this policy on behalf of such third party. If you are providing Personal Information on behalf of a minor, you hereby confirm that you are the parent or legal guardian of such minor.
- You hereby consent that the collection, storage, processing, disclosure and transfer of any Personal Information shall not cause any wrongful loss to You if it is done in accordance with the provisions of this Privacy Policy.
- You have the option not to provide us the Personal Information sought to be collected. You will also have an option to withdraw Your consent at any point, provided such withdrawal of the consent is intimated to us in writing. (If you wish to withdraw your consent, please [click here](#)). If you do not provide us Your Personal Information or if You withdraw the consent to provide us Personal Information at any point in time, We shall have the option not to fulfill the purposes for which the said Personal Information was sought and We may restrict you from using the Website or Services.