

## Privacy Policy

### **1. Scope and Application**

- 1.1 The terms '*We/Us/Our*' shall refer to **Neuropixel.AI Labs Private Limited**, having our registered office at Hanto Workspaces Technologies Pvt Ltd, Kaveri Building, 14<sup>th</sup> Main HSR Layout Sector 7, Bangalore –560102, Karnataka, India and the terms '*You/Your*' shall refer to the users/ members/ customers/ clients and any other persons accessing or seeking to use the Platform (as defined below) and/ or availing our Services (as defined below). We have created this privacy statement in order to demonstrate our firm commitment to privacy.
- 1.2 This privacy policy is an electronic record in the form of an electronic contract drafted under the (Indian) Information Technology Act, 2000, and the Information Technology (Reasonable security practices and procedures and sensitive personal data of information) Rules, 2011, as amended from time to time ("**Privacy Policy**"). At the same, we understand and recognise our legal obligations under the General Data Protection Regulation (EU) 2016/679 (the "**GDPR**"), and we are legally obligated to protect sensitive personal data and information as per the GDPR requirements as well.
- 1.3 This Privacy Policy is a legally binding document between you and us which governs the usage, collection, protection and sharing of any Information that you provide us, when you access <https://www.neuropixel.ai/> (the "**Platform**") and/ or use our Services via the Company Application and/ or through any of various mediums or devices now known or developed at a later date. For this purpose, the terms "Company Application" and "Services" shall have the meanings attributed to them in our Terms of Use.
- 1.4 This Privacy Policy shall be read together with the other policies published by us on the Platform, including without limitation the Terms of Use (together the "**Policies**").
- 1.5 This Privacy Policy is an electronic document and does not require any physical, electronic or digital signature. By accessing or using the Platform and/ or availing our Services, you indicate that you understand, agree and consent to the terms and conditions contained in the Privacy Policy. If you do not agree with the terms and conditions of this Privacy Policy, please do not use this Platform or the Company Application or avail our Services.
- 1.6 Please note that we are not responsible for, and this Privacy Policy does not govern Information provided other than through the Platform or the Company Application.

### **2. Commitment**

- 2.1 We are committed to ensure that your privacy is protected to all possible, reasonable and commercial extent, as your privacy and data protection is of the utmost importance to us.
- 2.2 We gather certain types of Information in order to provide, maintain and improve the Platform, the Company Applications and the Services rendered to you; and hence, we strongly urge you

to fully understand the terms and conditions of the Privacy Policy surrounding the capture and use of such Information.

### **3. Collection of Information**

- 3.1 For the purposes of rendering the Services and/ or use of the Platform, we may collect certain Information from various channels, including, but not limited to, voluntary submission of information from your end in furtherance of the access or usage of the Services and/ or the Platform, through requests initiated by you towards the Services and through communications.
- 3.2 We may use your internet protocol ("IP") address to help diagnose any problems (including with our servers), as well as to administer our Services and the Platform. Your IP address is used to help identify you and to gather broad information. We may use your IP address to help protect ourselves, and our partners and customers from any adverse acts. For system administration purposes, we may also log IP server addresses and catalogue traffic patterns through our Platform and Company Applications. However, we do not link this information to any users' personal information.
- 3.3 Please note that we are based in the Republic of India. We are governed by the (Indian) Information Technology Act, 2000; however, even though it may or may not accord the same degree of data protection as your home jurisdiction, our collection, storage and usage of Information will continue to be governed by this Privacy Policy. We will always endeavour to protect your Information.

### **4. Types of Information collected by the Us ("Information")**

#### **4.1 Personally Identifiable Information (PII)**

- (a) PII, as used in information security and privacy laws, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.
- (b) We may collect and retain certain PII including without limitation your name, age, gender, telephone number, mailing address, including but not limited to permanent and current residential addresses, email address, history of your transactions with us, etc. These PII are essential for rendering our Services to you and for our communications with you. We may also use this Information to customize our Services based on such Information as provided by you.
- (c) Any information exchanged by you with us in the form of written communication, responses to emails, feedback provided, participation in discussions, etc. is handled with confidentiality and will be available for our exclusive use.
- (d) You have the right to request to discontinue our use of your PII. To withdraw your consent to our collection and processing of your information in future, you may do so by specifically informing us that you are withdrawing your consent towards our use of your PII. However, please note that you will need to provide us with alternate means of communicating with you, if the Services are on-going in nature.

#### **4.2 Non-Personal Information (NPI)**

- (a) We also collect information in a form that does not permit direct association with any specific individual including without limitation the information of the browser you use, usage details and identifying technologies (“NPI”). NPI includes without limitation referring/ exit pages, anonymous usage data, and URLs, platform types, number of clicks, etc.). We request you to note that when you access the Platform and/ or the Company Applications or receive emails or any communication from us, we along with its affiliated companies and permitted agents, may use cookies and/or pixel tags to collect information and store your online preferences.
- (b) If we do combine NPI with PII, then the combined information will be treated as PII for as long as it remains combined.
- (c) We use various technologies to collect NPI including without limitation, cookies. A cookie is a piece of data that any website can send to your browser, which may then be stored on your computer as an anonymous tag that identifies your computer but not you. To enhance our Services, some of our webpages and applications use cookies, sent by us or our third party vendors, or other technologies. You may control the effect of cookies through your browser settings, however some features of our Services may not work properly if your use of cookies is disabled. Similarly, we may use web beacon in conjunction with cookies, to enhance our Services on a number of pages of the Platform. A non-identifiable notice of a visitor's visit to a page on the Platform is generated and recorded. Such notice may be processed by us or by our suppliers. To disable some of these features, you may disable cookies in your web browser's settings. Web beacon and other technologies will still detect visits to these pages, but the notices they generate are disregarded and cannot be associated with other non-identifiable cookie information.
- (d) We may also collect other non-specific information to provide you better access to the Services each time such as preferences and interests and other non-personal details names shared via the Platform, Company Application or email or any other medium. We may also store and publish such information to assist us in making the Platform and Services better and easier to use.

## **5. Information Usage and Sharing**

- 5.1 Our primary goal in collecting the Information is for us to facilitate better access to the Platform and render the Services to you, and to ensure quality and efficiency in the Services provided to you. Additionally, we will also be using the Information for our internal operational purposes, such as providing, maintaining, evaluating, and improving the Platform and the Services, and also for providing customer support. We would also be sharing the information with others in the manner provided in this Privacy Policy.
- 5.2 Please note that we do not and will not trade or sell your PII in any manner.
- 5.3 We may share Your PII with third parties in the following limited circumstances:
  - (a) To provide other businesses or persons for the purpose of processing PII on our behalf in connection with the Services or providing you with additional services related to our business and Services. We will require that these parties are subject to appropriate confidentiality and security measures;

- (b) We have a good faith belief that access, use, preservation or disclosure of such PII is reasonably necessary to: (i) satisfy any applicable law, regulation, legal process or enforceable governmental request including to law enforcement and in response to a court order, (ii) detect, prevent, or otherwise address fraud, technical or security issues, (iii) enforce applicable Policies of the Platform, which may be further extended to investigation of potential violations thereof, or (iv) protect against harm to our rights, safety or property, our users or the public as required or permitted by law;
- (c) To protect ourselves against third-party claims;
- (d) We may disclose/ share information to those third-parties who support our business, such as providing technical infrastructure services, analysing how our services are used, measuring the effectiveness of the Platform and the Company Applications, providing customer support and business support services, facilitating payments, or conducting research and surveys, and such information will be used for the limited purposes of such services received by us.

5.4 We may share NPI with interested third parties to help them understand the usage patterns and analyses for certain Services. Any NPI and data and analyses arising therefrom may be shared by us to our existing and potential partners, investors, service providers and others.

## **6. Links to/ from Third-Party Websites**

6.1 The Platform and/ or the Company Application may contain links to third-party websites, products, and services. Information collected by third parties, which may include without limitation information such as location data or contact details, is governed by the privacy practices undertaken by such third parties. We encourage you to learn about the privacy practices of those third parties. We expressly assert that we cannot be responsible for these practices.

6.2 We may have presence on social networking websites including but not limited to LinkedIn, Facebook, Twitter, Instagram, YouTube and blogs which are promotional and business initiatives to attract, engage and connect to a larger group of people. The domain links contained therein may either direct you to our Platform or our Company Application or request your participation by way of feedback, suggestions, etc. We, in this regard, fully disclaim any liability(ies) or claim(s), which may arise by use/misuse of your feedback, suggestions, views, etc. on any of the aforementioned networking websites or blogs, by any third party whether or not known to us.

## **7. Information Security & Retention**

7.1 We take precautions including without limitation administrative, technical and physical measures to safeguard your personal information against loss, misuse or theft, as well as against destruction, alteration, disclosure and unauthorized access.

7.2 Specifically, while we will ensure our best efforts to protect your Information in line with commercially reasonable efforts and general industry standards; however, we do not represent, warrant, or guarantee that your Information will be protected against unauthorized access, loss, misuse, or alterations beyond our reasonable control.

- 7.3 When you post on the Platform and/ or Company Application, some of the PII you share is visible to other users and can be read, collected, or used by them. You are responsible for such PII you choose to submit in these instances. For example, if you list your name and email address on the Platform and/ or Company Application while providing comments or reviews or any public feedback, that information may be public. Further, you are responsible for maintaining the confidentiality of your account and password, wherever applicable, and for restricting access to your computer/ mobile systems, and you agree to accept responsibility for all activities that occur under your account or password.
- 7.4 We may share your Information with third parties for the purposes mentioned in Section 5 under confidentiality arrangements in connection with our Services, which *inter alia* provides for that such third parties to not further disclose the Information.
- 7.5 Notwithstanding anything contained in this Policy or elsewhere, we shall not be held responsible for any loss, damage or misuse of your PII, if such loss, damage or misuse is attributable to a Force Majeure Event (as defined below):  
*A "Force Majeure Event" shall mean any event that is beyond Our reasonable control and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, unauthorised access to computer, computer system or computer network, computer crashes, breach of security and encryption (provided beyond our reasonable commercial control), power or electricity failure or unavailability of adequate power or electricity.*
- 7.6 You understand and agree that the we may continue to store your Information after you cease use of the Services or disable your use of, access to, or otherwise of the Services or the Platform. Please note that we shall not use, share or/ and disclose your PII with its affiliates, vendors, third parties etc., after you cease use of the Services or disable your use of, access to, or otherwise of the Services or the Platform, unless required by law to do so. NPI will be retained indefinitely, and we may however continue to use, share and/ or disclose your NPI in furtherance of our Policies.
- 7.7 Our Platform and/ or Company Application may provide links to any other website or locations for your convenience, but the provision of such links does not signify our endorsement of such other website or location or its contents. We have no control over, does not review, and cannot be responsible for these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or location or its contents.
- 7.8 Wherever we are processing your PII under consent in the manner provided in this Privacy Policy, you will always be able to withdraw that consent. However, in such circumstances, please note that your ability to use the Platform and/ or the Services may get impacted.
- 7.9 [Separately, we generally retain your PII as long as you keep you are accessing our Platform and/ or availing our Services, and for a period of 12 months thereafter, or if your account

with us has been inactive for more than 24 months. Following this period, we shall delete the PII or de-identify it so that it is anonymous and not attributable to any individual or user.]

## **8. Additional rights for users located in the EU and UK**

- 8.1 Please note that you will be entitled to all your rights under General Data Protection Regulation (EU) 2016/679 (the “GDPR”). If you want to exercise your rights regarding the PII, please contact us at the contact details provided below.
- 8.2 In particular, you will have the right to be informed, the right of access, the right of rectification, the right of erasure and the right to object, and all other rights and remedies available under the GDPR.

## **9. Grievances**

- 9.1 In case of breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed, we have the mechanisms and policies in place in order to identify it and assess it promptly. Depending on the outcome of our assessment, we will make the requisite notifications to the supervisory authorities and communications to the affected data subjects, which might include you.
- 9.2 In accordance with the legal requirements, the name and contact details of the Grievance Officer who can be contacted with respect to any complaints or concerns including those pertaining to breach of this Privacy Policy and other Policies are published as under:

Data Privacy Officer/ Grievance Officer Name: Arvind Nair  
Email address: arvind@neuropixel.ai  
Phone number: +91 8861580077

- 10.1 The Data Privacy/ Grievance Officer can be contacted between 10am to 5pm (IST) from Monday to Friday except on public holidays.

## **10. Governing Law**

- 11.1 We are incorporated in, and based out of the Republic of India, and we are duty bound to abide by Indian laws. We may not have complied with some privacy laws of other countries and further represent to be unaware of such other legal requirements.
- 11.2 Further, any disputes regarding this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of Bengaluru, India.

## **11. Questions and Contact Information**

12.1 If you would like to access, correct, amend or delete any of your Information shared with us, please register a complaint, or if you want more Information about this Privacy Policy, please contact us at [arvind@neuropixel.ai](mailto:arvind@neuropixel.ai). We shall respond to and address all reasonable concerns or inquiries in a reasonable amount of time.

**12. Updates to the Privacy Policy**

13.1 We reserve the right to modify, amend, suspend, terminate or replace this Privacy Policy from time to time within our sole discretion. We will post any changes made to the Privacy Policy on the Platform without prior notice to you. Such changes will take effect immediately upon their posting on the Platform. If we make material changes to this Privacy Policy, we may notify you that it has been updated to enable you to review the materially-changed Privacy Policy.

13.2 We encourage you to review the Privacy Policy frequently. By your continued use of the Platform and availing of our Services, you consent to the terms of the revised/ updated Privacy Policy.

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