**UTOR PRIVACY POLICY**

**This document sets out the privacy policy of UTOR Labs Private Limited**

**LIST OF DEFINITIONS**

Unless the context otherwise requires, in this Policy, the following capitalised terms have the meanings ascribed to them below:

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| **Grievance Officer** | An officer of UTOR responsible for addressing any discrepancies and grievances of persons who provide Information to UTOR, and whose details are provided in Section 8 of this Policy. |
| **UTOR** | UTOR Labs Private Limited, a company incorporated under the laws of the Republic of India. |
| **Information** | Various kinds and manner of Information about individuals or entities, as required for a Purpose, which may include:   * Name, * Email, * Name of your organisation, * Your designation at your organisation.   Specific lists of Information collected in relation to each Purpose are provided in Section 1.2 of this Policy, and we recommend that you read that Section closely in order to understand the Purpose for which UTOR may collect or request any Information. |
| **Policy** | This Privacy Policy, including any revisions, amendments, and updates thereto. |
| **Purpose** | [•] |

**POLICY STATEMENT**

UTOR provides [•] services for its clients through various means, which are enumerated below:

* Through its online service situated at the website [•];
* Through APIs or other technological or software systems or methods that gather data from its clients’ computers in a manner authorised by and agreed with, its clients;
* [•].

UTOR provides these services for its clients and customers in relation to the Purpose, and undertakes such activities based on the request of its clients and customers.

You may have been directed to provide certain Information for the Purpose to UTOR through any of the means listed above, by or on behalf of a client of UTOR. Note that your use of this website, and your providing any Information to UTOR through this website, or through any other means, is at the behest and direction, and on the request, of such client, and UTOR disclaims any and all responsibility in relation to such Information, other than as specifically accepted here, or in UTOR’s [Terms of Service](https://helloutora.com/wp-content/uploads/2024/03/UTORTermsOfService20190319.docx). You should read this Policy carefully to ensure that you are aware of the manner and purpose for which UTOR collects such Information from you, and the manner in which UTOR stores, processes, and uses such Information.

The entity or individual on whose direction or request you have been asked to visit this website, or provide Information to UTOR in any other manner, may have sought your authorisation to share your Information with UTOR; alternatively, UTOR may seek your authorisation and consent to obtain and use your Information, and shall specify the type of Purpose for which it seeks such Information from you. If you have not received or accepted such an authorisation from UTOR or any other entity or individual at whose behest or direction you are asked to provide any Information to UTOR, please:

* Do not share any Information with UTOR or its agents through any means;
* Do not proceed any further on this website, or provide any further Information on or through this website;
* Close the tab or window in your browser where this website is displayed; and
* Contact the entity or individual on whose direction you visited this website, or on whose direction you were contacted by UTOR.

Your proceeding with the use of this website, and/ or your providing any Information to UTOR on or through the use of this website or through any other means, is based upon the assumption that you have indeed executed and provided to such entity or individual, or to UTOR, such an authorisation, and the subsequent provisions of this Policy are based upon such an assumption.

UTOR is committed to protecting the privacy and personal Information provided voluntarily by individuals to enable UTOR to complete the Purpose. This Policy sets out the nature/type of Information UTOR collects, the Purpose of such collection and usage, disclosure of such Information, and UTOR’s security practices and procedures in relation thereto.

This Policy has been drafted in accordance with the provisions of the *Information Technology Act, 2000* of India, and the Rules thereunder, including the *Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011*.

**PLEASE READ THE POLICY CAREFULLY TO FULLY UNDERSTAND THE NATURE AND PURPOSE OF GATHERING INFORMATION, USAGE, DISCLOSURE, SECURITY PROCEDURES AND SHARING OF SUCH INFORMATION.**

1. **Nature/Type of Information Gathered, Purpose, and Duration of Storage**
   1. UTOR gathers/obtains Information about you, for the Purpose, if you choose to provide the same voluntarily by reading, understanding, and consenting to the terms of the aforementioned authorisation. UTOR only collects Information that is necessary to provide the services requested by its clients, which constitute the Purpose. If any other additional Information is required other than as stated here, then you will be informed of the same, and you should not provide such additional Information to UTOR unless you have consented to the same; neither will UTOR obtain or gather such Information from any other sources in the absence of such consent.
   2. Specifically, you may be requested to provide the Information listed in the table below in the event (i) you decide to proceed with the use of this website, or (ii) if you choose to share any Information with UTOR through any other means, in relation to the type of Purpose listed against each set of Information below; furthermore, UTOR may obtain such Information about you from its clients (i) through its website, or (ii) through the collection of physical or scanned documents through any other means, or (iii) through the use of APIs or other means that permit the transfer of Information from its clients’ databases or servers to UTOR, in relation to the type of Purpose listed against each type of Information below in the event that such client has provided UTOR a copy of a consent or authorisation from you to collect such Information:

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| --- | --- |
| **Purpose / Type of Service** | **Information Required** |
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|  |  |

* 1. UTOR does not collect any Information, without due notification to you and without your consent. By consenting to provide any Information to UTOR in relation to the Purpose, you are also consenting to the sharing of your Information with third parties for the Purpose, as described below.
  2. In some instances, UTOR may share Information about you with authorised service providers or vendors working on UTOR’s behalf to help fulfil the Purpose. UTOR may also store Information in a jurisdiction other than where you are based. By providing Information to UTOR, you are consenting to this transfer and/or storage of Information across borders. For more details and Information in relation to how UTOR may share Information about you with third parties, please see Section 2 of this Policy.
  3. UTOR may also disclose Information in connection with (i) the sale, assignment, or other transfer of its business, (ii) in order to respond to requests of government or law enforcement agencies, or (iii) where this is required by applicable laws, court orders, or government regulations, with prior intimation to you, to the extent that such intimation is legally permissible. UTOR does not sell Information to any third parties. Also, UTOR will not transfer the Information you provide to any third parties for their own direct marketing use. For more details and Information in relation to how UTOR may share Information about you with third parties or governmental and law enforcement agencies, please see Section 2 of this Policy.
  4. *Duration of storage*: UTOR stores Information for such duration as may be required to fulfil the Purpose. Such duration may vary by the type of Purpose contemplated in relation to such Information. By providing any Information to UTOR, you agree to UTOR’s storing such Information for the duration necessary to fulfil such Purpose. Note also that UTOR shall store Information beyond the duration required for the Purpose in the event it is mandated or obliged to do to under any applicable law.
  5. Please use your discretion when providing any Information to UTOR, and under any circumstances, do not provide Information to UTOR, unless you thereby consent to UTOR’s use of that Information for its legitimate business purposes and consent to the transfer and storage of such Information to and in UTOR’s databases. If you have any questions about whether the provision of Information to UTOR is, or may be, necessary or appropriate for particular purposes, please contact UTOR’s Grievance Officer at the coordinates provided in Section 8 of this Policy.

1. **Disclosure/Sharing of Information**
   1. To enable UTOR to provide services in relation to the Purpose, the Information provided by you may be shared by UTOR either with its own employees, other corporate entities and affiliates, or unaffiliated third party service providers (both in India and outside India) working on UTOR’s behalf to provide the service in relation to the Purpose, and all other agencies from which relevant data or responses are to be obtained for the Purpose (both in India and outside India), on a need to know basis, on conditions of confidentiality at least as stringent as those set out here.
   2. *Exceptions to Consent Limitations and this Policy, and Disclosure of Information*: UTOR may disclose Information if required to do so by law or upon the advice of its professional advisors, such as legal counsel, that such disclosure is reasonably necessary to respond to:
      1. court orders, or other legal process, or third party rights owners; or
      2. law enforcement offices, and / or Government agencies mandated under the law to obtain such Information;

Provided that UTOR shall provide prior intimation of such disclosure to you, to such extent as may be permissible under applicable law.

* 1. More specifically, UTOR may share the Information provided by you with the persons listed below in relation to the Purpose:

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| --- | --- |
| **Type of Information** | **Persons with whom such Information may be shared** |
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* 1. Please note that any provision of Information by you to UTOR, shall be deemed to constitute your acceptance of UTOR’s sharing such Information with third parties in accordance with the provisions of this Policy. If you do not consent to such sharing of Information, please:
* Do not share any Information with UTOR or its agents through any means;
* Do not proceed any further on this website, or provide any further Information on or through this website;
* Close the tab or window in your browser where this website is displayed; and
* Contact the entity or individual on whose direction you visited this website, or on whose direction you were contacted by UTOR.
  1. In case of an amalgamation, merger, acquisition or business transfer, UTOR will transfer all your Information to the acquirer.
  2. Although UTOR is committed to protecting your privacy, we do not promise, and you should not expect, that your Information will always remain private. As a user of this website, you understand and agree that you assume all responsibility and risk for your use of the website, the internet generally, and the documents you post or access and for your conduct on and off the website.

1. **Security Practices and Procedure**
   1. UTOR has enabled appropriate security procedures to secure the Information obtained, stored, processed, and used by UTOR during the course of its business, including ***[NOTE: Please discuss – are measures such as pseudonymisation / encryption adopted by the Company?]***.
   2. UTOR has reasonable security policies and procedures in place to protect Information from unauthorised loss, misuse, alteration, or destruction. Despite UTOR’s best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your Information is limited to those who have a need to know. Those individuals who have access to the Information are required to maintain the confidentiality of such Information, under conditions at least as stringent as those set out here. We also make reasonable efforts to retain Information only for so long as your account is active or you do not withdraw your consent.
2. **Updating and Deleting Information, Data Portability, and Withdrawing Consent**
   1. To ensure that the Information you provide is complete, accurate and up-to-date, UTOR allows you to change or correct your Information at any time. For any change/correction of Information you can make a request by contacting UTOR’s Grievance Officer at the coordinates set out in Section 8 of this Policy, and UTOR shall make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards.
   2. You may also request that all or any Information provided by you be deleted. You may do so by sending such a request to UTOR’s Grievance Officer at the coordinates set out in Section 8 of this Policy, in which event we will remove all copies of your Information from our records.
   3. You may also request a copy of all or any Information that you provide to UTOR, in a common machine-readable format. You may do so by sending such a request to UTOR’s Grievance Officer at the coordinates set out in Section 8 of this Policy, in which event we will retrieve all copies of your Information from our records and provide them to you in such a format.
   4. You may also withdraw your consent for UTOR to process the Information you provide to UTOR for the Purpose, or any activity that forms part of the Purpose, at any time by sending a notice to UTOR’s Grievance Officer at the coordinates set out in Section 8 of this Policy, in which event we will remove all copies of the relevant Information from our records; please note that such withdrawal of consent may prevent us from offering certain services to you through UTOR’s websites, software, or any other mechanisms; you will be informed of the possibility of such a cessation of services if we receive a notice of your withdrawal of consent in the manner described here, and, should you confirm that you wish to withdraw your consent to the processing of any Information you provide to UTOR, we will cease processing such Information, and may cease to provide certain services to you.
3. **Cookies**
   1. To enhance your experience on this website, we use a feature on your Internet browser called a "cookie". Cookies are small files that your Web browser places on your computer’s hard drive. We use cookies for remembering user names and passwords and preferences, tracking click streams, and for load balancing. Because of our use of cookies, we can deliver faster service, consistent, updated results, and a more personalised website experience. You have the option of setting your browser to reject cookies. However, doing this will hinder performance and negatively impact your experience on our website.
4. **Links to Other Sites**
   1. Please be aware that UTOR’s web sites may contain links to other sites that are not governed by this Policy but by their own privacy statements that may differ from this Policy. We encourage you to review the privacy policy of each website visited before disclosing any personal Information.
5. **Changes to this Policy**
   1. UTOR may change this Policy from time to time in its discretion. The date of the Policy is indicated at the top of the Policy. You may review the Policy periodically to understand the Privacy protection offered by UTOR for your Information.
   2. If you have any suggestions or questions you may contact UTOR’s Grievance Officer at the coordinates set out in Section 8 of this Policy.
6. **Grievance Officer**
   1. Should you have any complaint or grievance about the manner in which UTOR receives or processes your Information, you may write to our Grievance Officer, whose details are provided below. UTOR is committed to resolving any such grievances in an expeditious and effective manner.
   2. Details of UTOR’s Grievance Officer:

[Name]

[Office Address]

[Email Address]

[Phone Number]