

Dvara E-Dairy Solutions Private Limited Privacy Policy

Welcome to the **Dvara E-Dairy Solutions** Mobile App and Website operated and owned by **Dvara E-Dairy Solutions Private Limited** (hereinafter shall be referred to as “Dvara”, “Company”, “We”, “Us”, “Our” and terms of similar meaning) which presently has its registered office at Chennai.

Dvara manages the website <https://dvaraedairy.com/> (“**Website**”) and the mobile Application Dvara Surabhi Index (“**Mobile App**”). The Mobile App and the Website collectively referred to as the “**Platform**”. This Privacy Policy is a part of the Terms and Conditions to services provided by Dvara on Website and/or Mobile App.

The term “**User**” refers to all persons who browse, visit the Platform, and use its services. By accessing the Platform or otherwise using the Platform, you (hereinafter referred to as “You”, “Your”, “User” as applicable) expressly consent to Our collection, storage, use and disclosure of the Information (as defined hereunder) in accordance with the terms of this Policy.

This Privacy Policy is a part of the Terms and Conditions to services provided by Dvara on the Platform. All terms defined in the Terms and Conditions have the same meaning used here in this Privacy Policy. Any dispute with Dvara over privacy matters are subject to this Privacy Policy read in conjunction with the Terms and Conditions.

1. This Privacy Policy is published in compliance of:

- a. The Information Technology Act, 2000; and
- b. The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the “SPI Rules”).

“**Personal Information**” and “**Sensitive personal data or information**” shall be as defined under the SPI Rules. The information about the Users as collected by Dvara is:

- a. information supplied by Users; and,
- b. information automatically tracked while navigation (Information).

2. In order to avail the Services offered by or on the Platform, Users are required to register for an account and have to provide information and data (“Personal Information”) classified as ‘Sensitive Personal Information’ under Regulation 3 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“SPI Rules”). Personal Information provided in acceptance of this Policy shall amount to written consent under Regulation 5 of the SPI Rules.

3. User shall provide its name, gender, contact number, address details (including a copy of the address proof).

4. By using Dvara's Website or its services, you give Dvara your consent to collection, storage, and use of the Personal Information you provide (including any changes thereto as provided by you) for any of the services that we offer. To avail certain sites/ services on our Websites, Users may be required to provide certain information for the registration process that may include but not limited to:

- a. your name,
- b. email address,
- c. sex,
- d. age
- e. PIN code

5. Purpose for Collection of Data

- a. In furtherance of our legitimate interest in running a lawful business, and to balance it with the best of your interests, we shall process the information obtained from you. The below-given list is not exhaustive:
 - i. To provide services to you as set forth in our Platform;
 - ii. To allow our professionals, business partners to assist us in providing services to You, to connect with You to provide their services/products You may specifically consent to be contacted for;
 - iii. When it is requested or required by law or by any court or statutory authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offences.
 - iv. Safeguard our IT server/systems.
 - v. Improve the performance useability and effectiveness of our Platform.
 - vi. Conduct research and performance appraisal of our business.

6. Dvara presumes lawful parental consent in case the Personal Information is shared by a User under the age of 18 years.

7. All required information is service dependent and Dvara may use the above said User information to, maintain, protect, and improve its services (including advertising services) and for developing new services. Such information will not be considered as sensitive if it is freely available and accessible in the public domain or is furnished under the Right to Information Act, 2005, any rules made there under

or any other law for the time being in force. The primary reason for gathering information is to improve our products, deals, services, website content and navigation.

8. Cookie Policy

What are Cookies and its purpose?

To improve the responsiveness and user interface for our Users, Dvara may use “cookies” like session cookies, first-party cookies, third-party cookies and log files, or similar electronic tools to collect information like device Id mac-address, IP-address, device make, model, brand name, OS version, app version, GPS location to assign each User a unique, random number as a User Identification (User ID) to understand the User’s individual interests using the identified computer. Unless you voluntarily identify yourself, Dvara cannot know who you are, even if we assign a cookie to your computer. The only Personal Information a cookie can contain is information you supply. A cookie cannot read data off your hard drive. We receive and store certain types of information whenever you interact with us via Website, Mobile Application or service through your computer/laptop/netbook or mobile/tablet/pad/handheld device etc.

Disclaimer for any third-party cookie

Third parties may place or recognize a unique cookie on your computer while you are on our sites. In addition, such third parties may use technologies to collect information about your browsing behaviour on our sites which they may match with information they have previously collected. Our Privacy Policy does not cover any use of information that third parties may collect from you or that you choose to provide to them

9. Dvara automatically collects limited information about your computer’s connection to the Internet, mobile number, including your IP address, when you visit our Platform. Your IP address is a number that lets computers attached to the Internet know where to send you data – such as the pages you view. We automatically receive and log information from your browser, including your IP address, your computer’s name, your operating system, browser type and version, CPU speed and connection speed. We may also collect log information from your device, including your location, IP address, your device’s name, device’s serial number or unique identification number (e.g. UdiD on your iOS device), your device operating system, browser type and version, CPU speed, and connection speed etc. Details of your visits to our website and application such as traffic data, time stamps, web logs to our website and not limited to any other communication data.

10. We may receive information about you from other sources, add it to our account information and treat it in accordance with this Privacy Policy. If you provide information to the platform provider or

other partner, whom we provide services, your account information and order information may be passed on to us. We may obtain updated contact information from third parties in order to correct our records and fulfil the services or to communicate with you.

11. The Platform may include links to other websites or Mobile Applications. Such websites or Mobile Applications are governed by their respective privacy policies, which are beyond our control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the Mobile Application, you are visiting. We use third-party advertising companies to serve ads when you visit our Platform. These companies may use information (not including your name, address, email address or telephone number or other personally identifiable information) about your visits to this and other Websites or Mobile Application, in order to provide advertisements about goods and services of interest to you. We do not provide any Personal Information to third party websites/ advertisers/ ad servers without your consent, except in the circumstances mentioned in this Privacy Policy.

12. We take utmost care of our User's Personal Information and/or Sensitive Personal information and we share User's personal information with our employees and third-party facilities providers on strictly on a "need to know" basis hence we take all such steps to ensure that electronic records/information are protected with reasonable security practices as enumerated under the Information Technology Act, 2000 as amended from time to time and notifications and rules framed thereunder.

13. Amendments and Modifications to Policy

Dvara may amend or modify the terms under this Privacy Policy at any time with/without notice by publishing a revised version of the Policy on the Website/Mobile App. The revised version shall be applicable immediately from the date of its publication. To make sure the User is aware of any changes, it is advised that the User periodically review this Policy. Continued use of the Dvara Website and/or Mobile App after any change/amendment has been made to the Policy shall indicate the User's acknowledgment of such changes and agreement to be bound by the terms and conditions of such changes/amendment.

14. Period for retention of data

Dvara shall retain the User's information for as long as it is necessary to provide the services availed by the User available on the Website or the Mobile App or the User's request for the termination of the User's account with Dvara. Dvara may be further obligated to retain certain information for compliance with the applicable law or as part of its contractual obligations with its Partners for providing services to the User and accordingly such information shall be retained.

15. Changes and Erasure of Personal Information

If there are any changes to the Personal Information provided by the User to Dvara, the User may contact customer support at email id provided at Clause 20/ using the Platform to correct any inaccurate or out of date data.

16. Dvara may share the sensitive Personal Information to any third party/service provider/alliance partner without obtaining the prior consent of the User in a good faith belief that such disclosure is necessary under the following limited circumstances:

- a. Dvara proposes to share such information with its partners and officers and employees of such partners for the purpose of processing Personal Information on its behalf.
- b. Dvara may use third-party advertising companies to serve ads when the User's visits the Website. These companies may use Personal Information about the User's visit to the Website and other websites in order to provide advertisements about goods and services of interest to the User.
- c. Dvara shall transfer information about the User in case Dvara is acquired by or merged with another entity.
- d. Dvara may share the Personal Information with the service provider, in case the User shows interest in Applying for such Service.

17. We take Appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data.

18. Express Consent

The User hereby grants their unambiguous, free, informed and express consent to Dvara (including its marketing channels and business partners) to providing the tails/ documents/ information mentioned as stated hereunder for the purposes of this Privacy Policy. Further, the User hereby authorizes and expressly consents for Dvara to share their Personal Information with third parties in accordance with Clause 10 under this Privacy Policy for the purposes as described hereunder.

20. Complaints and Grievance Redressal

If the User has any grievance, complaint, questions, comments concern or feedback in relation to the collection and processing of information or regarding this Privacy Policy or any other privacy or security concern, the User may send an email to: edairy@dvara.com. We will resolve your concerns at the earliest. The User may choose to contact the Grievance Nodal Officer/ Data protection Officer:

Ms. Shakila Ramanathan

Grievance officer for Dvara E-Dairy Solutions Private Limited

10th Floor, Phase 1
IIT-Madras Research Park
Kanagam Village
Taramani, Chennai - 600113

21. Jurisdiction

By providing your consent to this privacy policy, you further accept that all disputes are subject to laws applicable in India and subject to jurisdictions of courts in the Chennai, Tamil Nadu, India only.

ALL INFORMATION GATHERED ON DVARA IS SECURELY STORED WITHIN DVARA CONTROLLED DATABASE. THE DATABASE IS STORED ON SERVERS SECURED BEHIND A FIREWALL; ACCESS TO THE SERVERS IS PASSWORD-PROTECTED AND IS STRICTLY LIMITED. HOWEVER, AS EFFECTIVE AS OUR SECURITY MEASURES ARE, NO SECURITY SYSTEM IS IMPENETRABLE. WE CANNOT GUARANTEE THE SECURITY OF OUR DATABASE, NOR CAN WE GUARANTEE THAT INFORMATION YOU SUPPLY WILL NOT BE INTERCEPTED WHILE BEING TRANSMITTED TO US OVER THE INTERNET. AND, OF COURSE, ANY INFORMATION YOU INCLUDE IN A POSTING TO THE DISCUSSION AREAS IS AVAILABLE TO ANYONE WITH INTERNET ACCESS.