

## PRIVACY POLICY

This document defines the scope of privacy and degree of confidentiality protecting the information which the User inputs during account registration at the app/ website and normal use of the services, programs and facilities of [www.vsttractors.com](http://www.vsttractors.com) (hereinafter 'Website/Application'). At any time, the User can, at his/her discretion, allow or forbid the collection and use of his/her personal information. Our legal basis for the collection of user data is India's Digital Personal Data Protection Act, 2023 ("DPDP Act")

By using this Website/Application, the User provides his/her consent to the Company to collect, use and disclose the User's personal information according to the rules and provisions of this agreement.

Website/Application is owned and operated by VST Tillers Tractors Ltd. (hereinafter "Company") and the Company hereby proclaims and accepts its responsibility to protect the User's private information. This Privacy Policy contains the rules upon which such information is gathered and used. These rules apply to any personal and non-personal information gathered at and/or by the Company.

- 1. SCOPE:** This privacy notice describes the information about you that Company collects through the Website/Application, how that information is used, maintained, shared, protected and how you can update it. It applies to personal data received by the Company from India, and personal data processed outside India for the purpose of providing goods and services to data principals in India in digital format (and non-digital format, if digitized subsequently). Please note that we are not obligated to observe compliances in relation to such sets of personal data that are excluded from the scope of applicable law (including personal data that has been made publicly available by the data principal to whom such data belongs or by any other person acting under a legal obligation to disclose the personal data) as per Section. 3 & 4 of DPDP Act, 2023.
- 2. PERSONAL INFORMATION:** The Company requires Users who register on the Website/Application to obtain information on the Company's products and services [Hereinafter referred to as "Products" or "Services"] to give contact information, their

name, date of birth, company name, address, phone number, email address, qualification and billing information (if required), such as billing name and address. The Company may also obtain personal information when Users login using third-party credentials. At the time Users express interest in obtaining additional information or when Users register for the service, Company may also ask for additional personal information such as alternate contact numbers, age, etc. Users can update their personal information at any time by logging into the Website/Application and editing their Personal Information within setup. Users can view their updated profile to confirm their edits have been made. Please note that our obligation or responsibility as a data fiduciary is limited to such instances where we specifically request for your personal data on our Platforms and does not include scenarios where you may, of your own accord, or on instructions of another party upload personal data on the Platforms or share personal data with another person

**3. NON-PERSONAL INFORMATION:**

- a. The Company (“Data Fiduciary”) may also collect non-personal information from Users, such as Users’ device, internet connection, geolocation, browser type, the URL of the previous Website/Applications User visited, User ISP, operating system, User Internet protocol (IP) Address, etc. (“Non-Personal Information”). Non-Personal Information cannot be easily used to personally identify the User.
- b. Cookies are very small text files that are stored on User system/device when Users visit some applications. Company uses cookies to help identify User system/device so Company can tailor User experience, management of the sign-up process and user management, general administration including tracking login and usage, managing newsletter or email subscription/surveys, shopping and payment facilities. In some special cases, Company also use cookies provided by trusted third parties for Analytics, advertising, social media etc. Company can disable any cookies already stored on Users’ system/device, but these may stop Company Website/Application from functioning properly.
- c. In general, User can visit the [www.vsttractors.com](http://www.vsttractors.com) Website/Application without telling Company who the User is or revealing any information about User.

However, Company's web servers may automatically collect the domain names/IP Address of visitors. This information is used to measure the number of visits, average time spent on the Website/Application and similar information, which is used to measure Company's Products/Services, evaluate performance, and improve Company's Products/Content/Services.

- d. Most of the cookies we use are so-called session cookies, which are automatically deleted by your browser after the end of your visit to our website. Session cookies provide us with information about visitor behavior on our website, which we analyze. With the knowledge gained, we will make our website more user-friendly, place important content on the most popular pages and develop our marketing strategies according to the interests of our target audience. Other cookies are stored longer on your device and allow us to recognize you as a user during a subsequent visit to our website. We do not pass on information that we receive through our cookies to third parties. By using the "Incognito" or "Private" mode of your browser, or by means of adjusting the settings in your browser, you can prevent the installation of cookies. As a result, some of the facilitation of operating our website will no longer work.
- e. We may use cookies to: (i) count your number of visits to the Website; (ii) accumulate anonymous, aggregate, statistical information on website usage; (iii) providing the appropriate content according to your need or viewing history; and (iv) save your password (only on allowing to do so by you) so you don't have to re-enter it each time you visit our sites. You can also disable cookies. By modifying your browser preferences, you can accept or reject all cookies, or request a notification when a cookie is set.

- 4. USE OF USER'S INFORMATION:** The Company uses the information that it collects to set up services for its Users. Users' email addresses and any personal customer information will not be distributed or shared with third-parties except to the extent necessary to provide the User with a requested Product/Service, or under circumstances required by law. The Company will disclose User's personal information when Company believes in

good faith that any applicable law, regulation, or legal process requires it, or where the Company believes disclosure is necessary to protect or enforce its rights or the rights of another user. Company also discloses aggregated User statistics in order to describe Company's Website/Application/Products/Services and reach to prospective partners, advertisers, and other third-parties. However, aggregate data is not traceable to the User specifically. The Company may use contractors to help the Company with the Company's operations. Some or all of these contractors may access Company databases of user information. These contractors will enter into an agreement with the Company that places restrictive provisions on their use and disclosure of all information they obtain through the relationship. The Company may share personal information with global partners for the purpose of providing Users with high quality, localized and customized services. The Company may use Non-Personal Information to track the use of the Website/Application/services and for other internal purposes, such as providing, maintaining, evaluating, and improving the Products/Services and the Website/Application. Users may, if they wish for any reason, delete their Personal Information or their Profiles. Upon User deleting their personal information or profiles the Company shall retain only an archival copy of information so deleted, which shall not be accessible on the internet for legal compliance. Company's use and data processing of information would be in compliance with the laws governing the protection of information technology and other applicable laws in force in India including Section 4 (1)(a) and 4 (1) (b) DPDP Act, 2023.

#### **5. OPT-OUT AND DATA MODIFICATION POLICY:**

- a. Users can opt out of being contacted by the Company, or receiving information as a whole or a part from the Company at any time by selecting the appropriate option provided for in their profiles or at any time by sending an email to [info@vsttractors.com](mailto:info@vsttractors.com) If, at any time after registering for information or ordering Products/Services, Users change their mind about receiving information from [www.vsttractors.com](http://www.vsttractors.com) Website/Application, the frequency with which they receive information or about sharing their information with third parties, they may modify

their choices in the options provided for the same on their profiles or simply send the request to [info@vsttractors.com](mailto:info@vsttractors.com)

- b. You have the right to complain about the improper processing of your personal data (such as collection, storage, modification, transfer, deletion, etc.) by emailing us at [info@vsttractors.com](mailto:info@vsttractors.com)
- c. You can also modify, correct, erase the information or withdraw your consent provided, the Company respects your right to access and control your information, and the Company shall respond to requests for information and, where applicable, will correct, amend, or delete your personal information. In such cases, we will need you to respond with proof of your identity before you can exercise the above rights.

**6. DISCLAIMER OF WARRANTIES:** The Company provides the services “as is”, “with all faults” and “as available.” The Company makes no express or implied warranties or guarantees about the services. To the maximum extent permitted by law, the Company disclaims all such warranties, including all statutory warranties, with respect to the services, including without limitation to any warranties that the services are merchantable, of satisfactory quality, accurate, fit for a particular purpose or need, or non-infringing. Company processes personal data collected according to the applicable legal provisions. This Privacy Policy further sets out your rights pertaining to the protection of your personal data. This privacy policy describes the information about you that the Company collects, how that information is used, maintained, shared, protected and how you can update it. It also applies to all personal data received by the Company in any format, including electronic or paper. It is effective on the date posted below and applies to our use of your information post effective date. Certain sections of the website/Application may require your personal data in order to cater your needs efficiently and to provide better information for the products, services or information as requested by you during your visit to the website. You are requested to read and understand the terms and condition as stipulated below in connection with the use of our website. The usage of the website includes unconditional acceptance of the terms of this

Policy by you. This website should be accessed only if you agree to the terms and conditions of our Privacy Policy and if you voluntarily consent and authorize the Company to use all the information provided by you in accordance with its Privacy Policy. If you do not agree to the terms of our Privacy Policy or are dissatisfied for any reason in relation to the websites/Application and / or any contents thereof, you are prohibited from further accessing the website.

- 7. LIMITATION OF LIABILITY:** User's sole and exclusive remedy for any dispute with the company is the cancellation of User's registration. In no event the Company shall be liable to the User for any claim relating to or arising out of User's use of the website/services. The Company shall in no event be liable to the User (or to any third party claiming under or through the User) for any indirect, special, incidental, consequential or exemplary damages arising from User's use of, or inability to use the website/services. These exclusions apply to any claims for lost profits, lost data, loss of goodwill, work stoppage, computer failure or malfunction, or any other commercial damages or losses, even if the Company knew or should have known of the possibility of such damages, because some states or jurisdictions do not allow the exclusion or the limitation of liability for consequential or incidental damages, in such states or jurisdictions, our liability shall be limited to the extent permitted by law.

We may disclose your personal data in good faith or whenever necessary to comply with a legal obligation or if disclosure was required by any law or by order of any competent court or statutory authority, to protect and defend the legal rights or any Intellectual Property Rights.

- 8. YOUR OBLIGATIONS:** You warrant to us that you will not use the Website/Application for any purpose that is illegal or prohibited by these terms of use and shall not use this Website/Application in any manner which could damage, disable, overburden or impair the Website or interfere with any other party's use and enjoyment of this Website. You shall not modify, copy, distribute, transmit, display, reproduce, publish, license, create derivative works from, transfer, or sell any data, services obtained from the Company website without our prior consent, directly or indirectly in any medium. Neither these

materials nor any portion thereof may be stored in a computer except for personal and non-commercial use.

**9. INTERNATIONAL DATA TRANSFER:** We may transfer information that we collect about you, including personal information, to affiliated entities, or to other third parties (as provided herein) across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If you are located in the European Union or other regions with laws governing data collection and its use that may differ from other countries' law, please note that you are transferring information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information and the use and disclosure of your information, including personal information, as described in this Privacy Policy and in accordance with Section 4(1) & Section 16 of DPDP Act, 2023.

**10. PERSONAL DATA AND INFORMATION:** We work hard to protect our users from unauthorized access or unauthorized alteration, disclosure, or destruction of information we hold. In particular:

- a. We encrypt our services using SSL.
- b. We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- c. We restrict the access to personal information by employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- d. If processing personal data is necessary to comply with a legal obligation, the Company shall carry out the processes, with Section 3 of DPDP Act, 2023 serving as a legal basis.

**11. COMPLIANCE AND COOPERATION WITH REGULATORY AUTHORITIES:** We regularly review our compliance with our Privacy Policy. When we receive formal written

complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

- 12. RETENTION, DELETION OR BLOCKING OF DATA:** We adhere to the principles of purpose limitation and data minimization. Therefore, we only store your personal data for as long as it is necessary to achieve the purposes (unless you withdraw your consent earlier) it was collected for or as long as the many storage periods required by law. After discontinuation of the respective purpose or expiry of these deadlines, the corresponding data will be deleted in accordance with the statutory provisions. Our legal basis for the deletion or blocking of personal data is Section 8(7) of DPDP Act, 2023.
- 13. RIGHT TO NOMINATE :** You have the right to nominate an individual who would be able to exercise your rights under applicable laws in the event of your death or incapacity in accordance to Section 14 of DPDP Act, 2023.
- 14. FORUMS AND INTERACTIVE SERVICES:** There may be interactive services within the Website/Application, such as blogs, chat rooms, forums, instant messaging etc., and other service member zones that allow them to input their data, details, materials, comments or other similar communications. Using such Website/Application/services, the User should realize that they are open for wide access and review, and any personal data that he/she published or provided during registration may become viewable by third parties. The Company is not responsible for the security of the User's information that is passed by the User to third parties or provided during use of such Website/Application/services.
- 15. MINOR USERS AND USERS WITH DISABILITY:** The Company does not intend to and will not purposely collect, require or request personal information from persons under 18 years of age without permission from parent or legal guardian. If the User is a minor, or a person with disability he/she should not enter his/her personal information or use the services/Website/Application in any way prior to obtaining the consent of the parent or legal guardian.



- 16. PHISHING:** Identity theft and the practice currently known as "phishing" are of great concern to the website/application. Safeguarding information to help protect User from identity theft is a top priority. We do not and will not, at any time, request User's credit card information or national identification numbers in a non-secure or unsolicited e-mail or telephone communication.
- 17. CHANGES TO THESE RULES:** The Company reserves the right to change the rules of the Privacy Policy at any time without notice. In case of a substantial change of confidentiality rules and policies of use of the User's personal information, the Company shall publish the changes on the Website/Application of the Company.
- 18. GOVERNING LAW & JURISDICTION:** This document shall be governed by, construed and enforced under the laws of India and Courts in Bangalore shall have exclusive jurisdiction.

**Last Updated: 9<sup>th</sup> February 2024**