

# Privacy Policy

LAST UPDATED ON JUL 17 2020

The Platform is made available by Xacmaz Technology Pvt. Ltd. (“our”, “us”, “we”, “Company”), having its registered office at 10/99 Chiranjiv Vihar, Ghaziabad, Uttar Pradesh – 201002. In order to provide you with the Platform and Services, we (i.e., the Company) need to collect various data and information from you. The manner in which this data and information is collected, retained, shared, stored, and processed by us (i.e., the Company) is addressed in this Privacy Policy (“Policy”). This Policy, incorporates, and includes our [Terms of Use](#) (“Terms”). Words and phrases not defined in this Policy shall mean the same as provided in the Terms.

## 1. Consent

By setting up and accessing, and using our Platform or setting up an account with us (as may be required from time to time), you agree to our processing, storage, usage, and sharing of data provided by you pursuant to this Policy. If you do not agree with any of the terms of this Policy or the Terms or wish to revoke any consent you have provided to us, please write to us at [support@blueskyhq.in](mailto:support@blueskyhq.in). However, if you revoke any mandatory permissions then we may have to cease providing you with access to the Platform and services therein.

## 2. Types of Data Collected

By accessing or using the Platform and/or the Services, you consent to providing us data in the ways listed below. However, we will not collect certain data, which we regard as sensitive in nature without your explicit consent. We collect the data that is essential for us to provide you Services in the best manner possible.

1. Basic Data to Access Research Material: You may need to provide name, phone number, email ID, date of birth, organizations name to access, and download the Research Material.
2. Geolocation data: We may collect your location data from you via our mobile and web application as well as our bots. In case you are using our mobile application, you may be required to provide consent at the time of downloading the application.
3. Feedback and Other Data: Any feedback data, information or suggestion that you may provide us.
4. Information Automatically Collected: We also automatically collect information about you and any computer or device you use to access the Service. Some of the information we collect, and ways we collect it, include:

**Cookies:** When you visit the Platform and/or use any Service, we may send one or more cookies — small text files containing a string of alphanumeric characters — to your computer or device that allows us to uniquely identify your browser, computer, or device. This may also include information such as your Internet Protocol (“IP”) address, unique device identifiers, your browser settings and specifications, and information about how you use the Platform and/or Services (e.g., the pages you view, the links you click, how frequently you access the Platform and/or Services, and other actions you take on the Platform and/or Services over a period of time).

**Log Files:** We may record log file information each time you access or use the Platform and/or Service. This information may include information such as your web request, IP address, browser type, unique device identifiers, information about your device, referring or exit pages and URLs, number of clicks and how you interact with links on the Platform and/or Service, domain names, landing pages, pages viewed, and other such information.

Clear Gifs: We may employ clear gifs (also known as web beacons or pixel tags) which may collect information about you, your computer or device such as your web request, IP address, unique device identifiers, browser type, information about your device, pages viewed, information about cookies, and all of which can show your Platform and/or Service usage patterns.

Device data: We collect data about the devices used to access our Platform and/or Services, including the hardware models, device IP address, operating systems and versions, software, preferred languages, Mac address, unique device identifiers, advertising identifiers, serial numbers, device motion data, and mobile network data.

Information from third parties: We may also be working closely with third parties (including, for example, business partners, technical sub-contractors, search information providers, and analytics providers such as Google Analytics). We may receive information about you and your Platform and/or Service usage patterns from such sources.

Bot Data: We use third parties and service providers (including SNS Sites) for providing the Bot services to you. Any personally identifiable information that you provide such service providers, (subject to the terms of use and privacy policies of the service providers) may be visible to us. We may also store and archive any information requested by you and provided to you via Bots (if you provide such information via our Platform). You are also requested to review the privacy policies of the relevant third parties and service providers before you access our services via such third parties or before providing any personal information to such third parties.

### **3. Use of Information Collected**

We need to collect, use, process, combine, retain and store personal information that we collect or receive (as provided in Section 1 of this Policy) for several reasons including:

1. For our business activities, including to provide the Services to you in an efficient and robust manner;
2. Perform internal operations necessary to provide our Services, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends;
3. To communicate with you and respond to your requests, such as to respond to your questions, contact you about changes to the Services, and about new products and services;
4. To provide customer support, including to resolve your concerns from the use of the Platform and/or Services;
5. For marketing and outreach, such as to market to you or offer you our and third party special offers or other products or services we think that you may be interested in;
6. For analytics and research purposes and otherwise to improve our Services;
7. To enforce this Policy and Terms, and otherwise to carry out our obligations and enforce our rights in relation under the Terms;
8. To investigate or address claims or disputes relating to use of our Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries; and/or
9. For any other lawful purpose, or other purpose that you consent to.

### **4. Sharing Of Collected Information**

We are very protective about your data and do not share any sensitive or personal data about you with any third parties unless necessary. However, we may share your information with third parties in the following circumstances:

1. To service providers, subcontractors, partners, vendors, consultants, and others companies (whether in or outside India) that help us with any of the purposes noted above or otherwise in this Policy;
2. To our affiliates, parent companies, subsidiaries, and other related companies (whether in or outside India), all for the purposes noted above or otherwise in this Policy;
3. To third parties for research, marketing or advertising purposes;
4. While negotiating or in relation to a change of corporate control such as a restructuring, merger or sale of our assets, we may have to disclose our databases and information we have stored in the course of our operations;
5. To other third parties subject to your consent;
6. To any governmental authority or law enforcement officers who request or require any information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process;
7. enforce applicable terms of use, including investigation of potential violations thereof;
8. detect, prevent, or otherwise address illegal or suspected illegal activities (including payment fraud), security or technical issues; and/or
9. protect against harm to our rights, property or safety, our users or the public, as required or permitted by law.

## 5. Your Rights

You shall have the right to restrict our usage of the data in the manner provided below. Please write to us at [support@blueskyhq.in](mailto:support@blueskyhq.in) if you wish to exercise any of the following rights under the Policy.

1. Right of Rectification: \*\*\*\*In the event that any personal data provided by you is inaccurate, incomplete or outdated then you shall have the right to provide us with the accurate, complete and up-to-date data and have us rectify such data at our end immediately.
2. Right to Opt-Out: We may email and notify you from time to time about our latest offerings and updates. You may opt-out of receiving such promotional emails or push notifications on your devices from us by writing to us. You may also opt-out of receiving emails and other messages from us by following the unsubscribe instructions in those messages. However, even if you have opted out of receiving information from us, we will still send you non-promotional communication.
3. Right to Erase Personal Data: You have the right to demand us to erase your personal data and we will do so without undue delay, provided that the data is no longer required by us and there is no legal requirement to retain the data.
4. Right to Withdraw Consent: You have the right to withdraw your consent to this policy by not using our Platform and Services.

## 6. Cross Border Data Transfer

Your personal data held by us may be transferred to other countries outside your residential country for any of the purposes described in this Policy. You understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality

afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. In addition, a number of countries have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.

If we transfer your personal data to third parties for purposes stated in this Policy, we will use best endeavors to put in place appropriate controls and safeguards to ensure that your personal data is kept accurate, adequately protected, and processed only for specified and reasonable purposes in a manner that is fair, transparent and has a lawful basis, and is stored for no longer than is absolutely necessary.

## **7. Data Protection Practices**

We use appropriate technical and organizational security measures to ensure a level of protection for personal data appropriate to the nature, scope and purpose of processing personal data, the risks associated with such processing, and the likelihood and severity of the harm that may result from such processing.

However, remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security. We are not responsible for circumvention of any privacy settings or security measures contained on the Platform and/or Services, including through the illegal acts of third parties.

## **8. Data Retention**

We shall retain the information you provide to facilitate your smooth and uninterrupted access and use of the Platform and/or Services, and (i) to provide, improve and personalize our Platform and/or Services; (ii) to contact you about your account and give customer service; (iii) to personalise our advertising and marketing communications; and (iv) to prevent, detect, mitigate, and investigate fraudulent or illegal activities. We do not retain your personal data for longer than required for the purpose for which the information may be lawfully used. For any other information, we will entertain your request for deletion, however, you may not be able to use our Platform and Services at all after such deletion.

## **9. Grievance Officer**

We have appointed a data grievance officer. Our data grievance officer is: Tejasvini Puri accessible via email at: [support@blueskyhq.in](mailto:support@blueskyhq.in). You can contact the officer confidentially by email to enquire about the treatment of your personal information.

## **10. Children's Privacy**

Our Platform and/or Services are not directed to children, and we do not knowingly solicit or collect personal information from persons under the age of 18 (eighteen). If we find out that a child has given us personal information, we will take steps to delete that information and terminate the use and/or access of the Platform and/or Services.

## **11. Communications**

We may from time to time send you Service-related announcements when we consider it necessary to do so (such as when we temporarily suspend the Platform and/or Services for maintenance, or security, privacy, or administrative-related communications). We send these to you via SMS/push notifications/email/instant messaging, as we deem fit.

## **12. Third-Party Websites**

The Platform may provide links to third-party websites and online services. This Policy does not describe the privacy practices of those websites or services. Please review the privacy policies of those websites or services before providing personal information to them.

### **13. Updates**

We may update this Policy from time to time. Your continued access of the Platform and/or use of our Services after an update constitutes consent to the updated notice to the extent permitted by law. Please periodically review this Policy for the latest information on our privacy practices.