

Updated on 18-May-2023

1. PRIVACY POLICY – INTRODUCTION

1.1 NCUBATE CAPITAL is committed to ensuring privacy of the Users on its website (“Website”) and/or mobile application (“Mobile App”). In furtherance of the same, NCUBATE CAPITAL has framed this Privacy Policy in accordance with the Information Technology Act, 2000 (“Act”) read with the applicable Rules thereunder.

1.2 The Privacy Policy is designed to familiarize Users of this Website / Mobile App with (a) the type of information that Users may share with NCUBATE CAPITAL, or that NCUBATE CAPITAL will collect from the Users; (b) practices and policies of NCUBATE CAPITAL relating to collection, storage, dealing, transfer, disclosure, transfer etc. of information pertaining to Users; (c) purpose of collection and usage of such information, and related matters.

1.3 This Privacy Policy forms part of the Terms of Use of the Website / Mobile App.

2. IMPORTANT TERMS

2.1 Please read the terms of this Privacy Policy carefully. This Privacy Policy, along with the “Terms of Use” constitute an “electronic record” in the form of an “electronic contract” as defined under the Information Technology Act, 2000 between NCUBATE CAPITAL and the User of this Website / Mobile App. This Privacy Policy does not require any physical, electronic or digital signature.

2.2 This Privacy Policy forms an integral part of the “Terms of Use” of the Website / Mobile App. If You do not agree with the terms of this Privacy Policy, please do not use this Website / Mobile App. By visiting this Website / using the Mobile App, you (a) unconditionally accept, and agree to be bound by the “Terms of Use” of the Website/ Mobile App, read with this Privacy Policy; and (b) expressly consent to the collection, receipt, possession, storage, usage, dealing, handling or transfer of Your personal information by NCUBATE CAPITAL in accordance with the terms of this Privacy Policy.

2.3 The Privacy Policy can undergo a change at any time at the discretion of NCUBATE CAPITAL. Therefore, it is suggested that You regularly check the Website / Mobile App to be apprised of the latest changes made to the Privacy Policy.

3. TYPES OF USER INFORMATION

3.1 Collection of “Information”: NCUBATE CAPITAL may request for, collect or gather such “Information” (which shall include data) as it deems necessary, relevant or incidental for rendering an improved shopping experience to Users and for other purposes as specified in Paragraph 6 below.

3.2 Personal Information: Such “Information” may include Personal Information relating to Users such as (a) User’s name, address, telephone number, e-mail address, postal address, delivery address (if different), gender, purchase history etc. (b) financial information such as bank account or credit or debit card information; (c) physical condition of User; (d) a description of the item requested or purchased; (e) the internet protocol (“IP”) address of User’s computer; (f) any other “sensitive personal data or information” relating to the User as defined under the applicable Rules under the Act.

3.3 Non-personal Information NCUBATE CAPITAL may also collect certain non-personal Information from the User, when the User visits and / or uses the Website / Mobile App. Such non-personal Information would include but not be limited to information such as geographical location of User, IP

address, type of browser, operating system of User's device, and details of usage of Website / Mobile App etc. Such non-personal Information is collected through various ways including "cookies". Cookies are text files placed on Your computer, to help the Website / Mobile App analyse how You use the Website / Mobile App. Such information is not used to track information about individuals, but is used on an aggregate level to customize our site, improve the online experience of the User and plan advertising and promotions.

3.4 Cookies, Web Beacons and Tracking Codes:

Cookies are small text files that a website downloads onto your computer or other internet-enabled devices (such as mobile phones and tablets) when you visit a website. The cookie will help the Website / Mobile App recognise your device the next time you visit.

We may use both session cookies (disappear after you close your browser) and persistent cookies (remain after you close your browser and may be accessed every time you use or connect to our Website / Mobile App). We may collect information like user's IP address, geographical location, browser/device type and version, operating system, referral source, device, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of user website use through "cookies".

You can block cookies by activating the setting on your browser that allow you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site, or they may not function properly.

4. MODES OF COLLECTION OF USER INFORMATION

4.1 The information referred to above may be collected or received by NCUBATE CAPITAL (a) directly from the User, when the User either provides any specific information on the Website / Mobile App; or (b) from use of the Website / Mobile App by the User (including through IoT device placed in the NCUBATE CAPITAL product purchased by the User); or (c) from third parties who have collected any Information relating to the User, and who have shared it with NCUBATE CAPITAL.

4.2 There are times when You may provide information to us voluntarily, otherwise than through use of the Website / Mobile App. This occurs when You provide Your feedback to us through e-mails, return forms, letters or telephone calls. We may use this information to respond to Your query and to keep track of feedback received from You.

5. PURPOSE OF COLLECTION AND USAGE OF INFORMATION

NCUBATE CAPITAL may collect, store and use Information for any purpose as may be permissible under Applicable Laws, including but limited to the following:

- (a) To display the User's business listing or Product offerings across the Website / Mobile App to fetch maximum business opportunities for the User;
- (b) Facilitation of Your use of the Website / Mobile App, handling and execution of orders placed on the Website / Mobile App by the User, process payments, communication with User about orders etc.;
- (c) Respond to any inquiries posed by the User;
- (d) Provide User with details of important schemes, offers, Product details, new Product launches, changes to terms of use of the Website / Mobile App, order details, delivery details and make other important announcements etc. ;

- (e) Maintain accounts of the User, display contents inputted by User such as User profile, User wishlist etc.;
- (f) Help recommend to the User merchandise and services that may be of interest to him / her;
- (g) Personalize User's experience on the Website / Mobile App by presenting advertisements, Products and offers tailored to the User's preferences;
- (h) Customization, administration etc. of the Website / Mobile App, location of errors, Website / Mobile App testing, data analysis for the Website etc;
- (i) Provision of various services on the Website / Mobile App;
- (j) To protect integrity of the Website / Mobile App, improve our platform, prevent or detect fraud or abuse of our Website / Mobile App;
- (k) To conduct analytical studies on various aspects including User behaviour, User preferences etc.
- (l) Enable third parties to carry out technical, logistical or other functions on our behalf;
- (m) To permit employees of the Company to contact Users, and enable them to implement the orders placed by Users, resolve User queries, issues, grievances etc.;
- (n) To further improve the product and/or services, to facilitate the servicing of User's product and/or to give insight on User's product experience.
- (o) To trace computer resources of any person for the purposes of determining compliance with the provisions of the Information Technology Act, 2000 and / or any other law for the time being in force.

6. DISCLOSURE AND RETENTION OF USER INFORMATION

6.1 NCUBATE CAPITAL considers the Information about its customers as an important part of its business. Accordingly, NCUBATE CAPITAL shall not engage in sale of Information relating to Users to third parties. However, NCUBATE CAPITAL may share User information with third parties in the circumstances specified herein below, after reasonably assuring itself that such third parties have undertaken to maintain confidentiality of Personal Information relating to the Users:

(a) Third Party Vendors / Service Providers etc.: Personal Information relating to Users may be made available to the third party Vendors, distributors etc. who sell their Products on the Website / Mobile App. Further, NCUBATE CAPITAL may engage third party service providers to render various services, and perform various functions in relation to the business undertaken on the Website / Mobile App, and / or for the Purpose(s) discussed in Paragraph 6 above. For instance, NCUBATE CAPITAL may engage third party service providers for maintenance of its Website / Mobile App, fulfilment of orders, delivery of packages, analysing data, providing marketing assistance, processing of credit card payments, provision of customer services etc. Such third party service providers / Vendors would have access to Personal Information of Users for the purpose of performing their functions / rendering their services etc.

(b) Business Transfers: NCUBATE CAPITAL may transfer or otherwise share some or all of its assets, including Your Information in connection with a merger, acquisition, reorganization or sale of assets or business or in the event of bankruptcy. Should such a sale or transfer occur, NCUBATE CAPITAL will reasonably ensure that the Information You have provided and which we have collected

is stored and used by the transferee in a manner that is consistent with this Privacy Policy. Any third party to which NCUBATE CAPITAL transfers or sells as aforesaid will have the right to continue to use the information that You provide to us or collected by us immediately prior to the transfer.

(c) Government Agency: NCUBATE CAPITAL may share any Information relating to Users (i) with Government agencies mandated under the law to obtain Information relating to Users from NCUBATE CAPITAL; (ii) any third party, when NCUBATE CAPITAL is required to disclose the same under an order of a government or judicial authority under any law for the time being in force, or where such disclosure is necessary for the compliance of a legal obligation.

(d) With User Consent: Without prejudice to the aforesaid, NCUBATE CAPITAL may disclose Personal Information relating to the User with his / her / its consent. For this purpose, NCUBATE CAPITAL may send a prior notice to the User before sharing Personal Information relating to the User with third parties. In case no objection or intimation is received from the User, NCUBATE CAPITAL would presume that User has granted its consent for sharing of said Information with third parties.

By using or visiting the Website / Mobile App and agreeing to the terms of this Privacy Policy, User shall be construed to have consented to, and accepted the disclosure of his Information to third parties as provided under this Privacy Policy.

6.2 NCUBATE CAPITAL will share Your Personal Information internally with such persons who need it to complete Your purchase or carry out Your instructions regarding the receipt of marketing information.

6.3 NCUBATE CAPITAL shall keep sensitive personal data or information for only as long as the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force. For those customers who have registered for the mailing list, their personal information is kept until we are notified that they no longer want their information stored.

7. SECURITY PRACTICES AND PROCEDURES FOR PROTECTION OF INFORMATION

In order to make every effort to ensure that Your experience on the Website / Mobile App is secure, we use encryption technology to protect You against the loss, misuse or alteration of Your personal information. When You fill out any contact forms or access Your account, a secure server encrypts all of Your information through the use of Secure Socket Layers (SSLs).

To be sure You are browsing secure pages for transactions, check Your Web browser's status bar (located at the bottom of the window) for the closed padlock icon. This icon appears in Your web browser to tell You that You are viewing a secure web page. Also, all browsers display an "s" after the "http" (https://) in the Web site address to indicate that You are in a secure environment.

8. ACCURACY AND PROTECTION OF PERSONAL INFORMATION

NCUBATE CAPITAL relies on Users to notify it of any changes in personal information. Should any inaccurate information come to NCUBATE CAPITAL's attention, it will investigate and correct the information and, if necessary, apprise the User of the change. Only those staff members who need the User's personal information in order to respond to the User's requests are given access to it. Employees are provided with training and information regarding the proper handling of personal information. All information stored in NCUBATE CAPITAL's computer system is protected from unauthorized access and information that is stored in document form is kept in secure locations to prevent access by unauthorized persons.

9. USER DISCRETION AND THE CHOICE TO OPT OUT

You can block cookies by activating the setting on your browser that allow you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site, or they may not function properly.

The Users have a choice to opt-out of receiving non-essential (promotional, marketing related) communications from us, after setting up an account.

In order to remove Your contact information, please visit [Unsubscribe](#).

10. GRIEVANCE OFFICER

In compliance with Information Technology Act, 2000 and rules made thereunder, the name and contact details of the Grievance Officer are provided below:

Name: NCUBATE CAPITAL

Address: 221, PHASE – 1, UDYOG VIHAR, GURGAON, HARYANA – 122016

Phone: +91-124 403 5614

Email: grievance.officer@sar-group.com

Time: 9:00 AM to 6:00 PM

11. UPDATES TO THIS PRIVACY POLICY

We may periodically update the Privacy Policy. Please refer the Updated on legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on our Website / Mobile App. Your use of the Website / Mobile App following these changes means that you accept the revised Privacy Policy.

GOVERNING LAW

The Website and Mobile App are designed and targeted to users who reside in the Republic of India and is governed by and operated in accordance with the laws of the India. By accessing and/or providing personal information through the Website / Mobile App, you confirm that you meet the legal requirements for disclosure of personal information in your jurisdiction.