# **Privacy Policy**

Effective Date Sept 5th, 2022

Invock Digital Private Limited (collectively 'Invock Digital 'or 'we' or 'us' or 'our') is committed to protecting your privacy. We gather and processes your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This Privacy Notice ("Notice") describes how Invock Digital processes Personal Data in its capacity as a controller (i.e. Invock Digital decides what Personal Data is collected and what it is used for) or processor (i.e. Invock Digital only processes the data as per the controller's instructions), as the case may be. This notice also provides you with the necessary information regarding your rights and our obligations and explains how, why and when we process your personal data.

# Information That We Collect

Invock Digital Private Limited processes your personal information (information that specifically identifies an individual or that is linked to information that identifies a specific individual) to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

# The personal data that we collect from you are:

Name, Address, Email Address, Telephone Number, Candidate CV which contains personal data related to the candidate, Social Data such as social website provider's id, token, public profile.

# We collect information in the following ways:

- A representative from Invock sets up customers' company & personal data on Invock software
- 2. Customer of Invock uses our software as a data controller and enters data about their parties, inventory, and accounts where we act as data processors
- 3. Parties personal data is submitted via party app
- 4. Marketing Emails

By authorizing us to connect with an Integrated Service, you authorize us to access and store your information such as display name, public profile URL, Image URL, Access and Refresh Token, Provider's ID and User ID and other information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us and make changes as appropriate.

Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Service

## How We Use Your Personal Data

Invock Digital Private Limited takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice.

- 1. The purposes and reasons for processing your personal data are detailed below:
- 2. We collect your personal data in the performance of a contract or to provide a service. We use the information to operate, maintain, enhance and provide all features of the Service, to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Service. We process personal data collected in the performance of a contract solely in accordance with the directions provided by the contract.
- 3. We will occasionally send you marketing information like updates on promotions and events relating to products and services offered by us where we have assessed that it is beneficial to you as a customer and in our interests. Such information may be non-intrusive and is processed on the grounds of legitimate interests.
- 4. We may use your email address or other information to contact you for administrative purposes such as customer service, to address intellectual property infringement, right of privacy violations or defamation issues related to personal data posted on the Service

5. We use the information to understand and analyze the usage trends and preferences of our users, to improve the Service, and to develop new products, services, feature, and functionality

# Your Rights

You have the right to access any personal information that Invock Digital Private Limited processes about you and to request information about:

- 1. What personal data we hold about you
- 2. The purposes of the processing
- 3. The categories of personal data concerned
- 4. The recipients to whom the personal data has/will be disclosed
- 5. How long we intend to store your personal data for
- 6. If we did not collect the data directly from you, information about the source If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use. If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure. If we are data processors and you shared your data in our systems on behalf of a customer (Data controller), we may redirect you to raise the request with the data controller. Requests to access, change, or remove your information will be handled within thirty (30) days.

## Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

## **Unrestricted information**

Any information that you voluntarily choose to include in a Public Area of the Service, such as a public profile page, will be available to any Visitor or User who has access to that content.

## Log Data:

When you interact with the Site or use our Services, our servers automatically receive and store certain personally non-identifiable information ("Log Data"). This Log Data is collected passively and may include information such as your IP address, browser type or the domain from which you are visiting, the Site pages you visit, the search terms you use, and any advertisements on which you click. For most users accessing the Internet from an Internet service provider, the IP address will be different every time you log on. We use Log Data to provide you with the Services (for example, to provide push notifications on your mobile device) and pool it with other information to monitor the use of the Services, and for the technical administration of the Services. We identify and use your IP address to help diagnose problems with our server, and to administer our Website. Your IP address is also used to help identify you and to gather broad demographic information.

# **Service Providers**

We work with third party service providers who provide a website, hosting, maintenance, and other services for us. These third parties may have access to, or process Personal Data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.

### Single sign-in

You can log in to our websites using sign-in services such as company website login. These services will authenticate your identity and provide you the option to share certain personal information with us such as your name and email address.

# **Third-Party Advertisers**

Invock does not provide any personally identifiable information to these

third-party ad servers or ad networks without your consent. However, please note that if an advertiser asks Invock to show an advertisement to a certain audience and you respond to that advertisement, the advertiser or ad server may conclude that you fit the description of the audience they are trying to reach. The Invock Privacy Policy does not apply to, and we cannot control the activities of,

third-party advertisers. Please consult the respective privacy policies of such advertisers for more information.

## **Safeguarding Measures**

Invock Digital Private Limited takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures in place, including:

- 1. Encryption of data during transit (HTTPS)
- 2. Encryption of data at rest
- Restricted access to only authorized personnel through authentication and password mechanisms
- 4. Implementation of anti-malware software
- 5. Network protection through firewalls

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact us as set forth in the "How to Contact Us" section. If we learn of a security systems breach, we will inform you of the occurrence of the breach in accordance with applicable law.

#### **Consequences of Not Providing Your Data**

You are not obligated to provide your personal information to Invock Digital Private Limited, however, as this information is required for us to provide you with our services, we will not be able to offer some/all our services without it.

#### Legitimate Interests

As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We use the legitimate interests' legal basis for processing direct marketing emailers/phone calls and have identified that our interests are to provide you with high quality, best in industry, performance support system to ease and improve user onboarding, support and training.

#### **Cookie Notice**

A 'cookie' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as visited pages or logging-in options.

Cookies are widely used in order to make websites work or to work more efficiently, and our site relies on cookies to optimize user experience and for features and services to function properly.

We use automatically collected information and other information collected through our website through cookies and similar technologies to: (i) personalize our service, such as remembering your information so that you will not have to re-enter it during a visit or on subsequent visits; (ii) provide customized advertisements, content, and information; (iii) monitor and analyze the effectiveness of Service and third-party marketing activities; (iv) monitor aggregate site usage metrics such as total number of visitors and pages viewed; and (v) track your entries, submissions, and status in any promotions or other activities on the Service.

These cookies do not collect personal information about you. A persistent cookie remains on your hard drive after you close your browser so that it can be used by your browser on subsequent visits to the Service. Persistent cookies can be removed by following your web browser's directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Service may not function properly if the ability to accept cookies is disabled.

Most web browsers allow some control to restrict or block cookies through the browser settings, however, if you disable cookies you may find this affects your ability to use certain parts of our website or services.

#### Minors and Children's Privacy

Protecting the privacy of young children is especially important. Our Service is not directed to children under the age of 16, and we do not knowingly collect Personal Data from children under the age of 16 without obtaining parental consent. If you are under 16 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Data has been collected on the Service from persons under 16 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information.

If you are a parent or guardian and discover that your child under 16 years of age has obtained an Account on the Service, then you may alert us at founders@invock.com and request that we delete that child's Personal Data from our systems.

#### How Long We Keep Your Data

Invock Digital Private Limited only ever retains personal information for as long as is necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements) and we have strict review and retention policies in place to meet these obligations. Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

#### Marketing

#### LEGITIMATE INTERESTS

Invock Digital Private Limited will occasionally send you marketing material/offers related to our services by email and tele-conversation that have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and is non-intrusive and you will always have the option to opt-out/unsubscribe at any time. Personally identifiable information collected/stored under this legitimate interests' basis is protected by the same security measures listed in the 'Safeguarding Measures' section above.

If you would prefer not to receive above-mentioned marketing and offers, please follow the instructions to unsubscribe given in communication email

## Amendments

Amendments to this Notice will be posted to this URL and will be effective when posted. If we make any material changes, we will notify you by means of a notice on this Website prior to the change becoming effective and if you are our Customer, via e-mail (specified in your Account). Provided we will not be notifying you if we amend the Notice to make addition, deletions or modifications to the list of cookies from time to time to keep the list of cookies current and accurate. You should frequently visit this Notice to check for amendments. Your continued use of our Websites or the Service(s) following the posting of any amendment, modification, or change to this Notice shall constitute your acceptance of the amendments to this Notice. You can choose to discontinue use of the Websites or Service(s), if you do not accept the terms of this Notice, or any modified version of this Notice.

# How to Contact Us

Invock Digital Private Limited only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with our Data Protection Officer at founders@invock.com or via postal mail Invock Digital Private Limited's registered office is at Front, Floor 2nd, 72, Keshri Bhavan, Shaikh Memon Street, Zaveri Bazaar Mumbai, MH 400002.

This document was last updated on Sept 5th, 2022