

We, at SMIN COMPOSITE TECH PRIVATE LIMITED having its registered office at 2 Floor, Plot No 4 Office,9A Minarch Tower Sec 44, Gurgaon Sector 45, Sector -45, Gurgaon-122003, Haryana and any of its applicable Affiliates and permitted assigns, (hereinafter "Us", "Our" or "We" or L&T-SUFIN)), value the trust that users (hereinafter "You", "Your") place upon Us and are fully committed to protect any Personal Information and Sensitive Personal Information, which we secure from You. Your privacy is valuable to Us and hence, we strive to maintain the best in the industry robust and holistic data security practices which are currently prevalent, and are committed to adhere to all applicable laws concerning data protection of users, at all times. This Privacy Policy will provide all essential information pertaining to what Personal Information and Sensitive Personal Information We collect from You, how We treat the information we collect, how the dissemination or sharing of the information will be done, and how We will address any grievances, which You may have.

Please note that this Privacy Policy is subject to changes which are necessitated from time to time on account of change in Applicable Laws, evolution of technological standards, changes in safety and security standards etc. We request You to periodically check this Privacy Policy to be aware of any changes which may periodically be made to this Privacy Policy, if any.

By impliedly or expressly accepting these Terms, You also accept and agree to be bound by other Policies as published on the Platform (including but not limited to Terms of Use, Intellectual Property Policy etc..) as amended from time to time. We request You to read this Privacy Policy carefully to understand our approach pertaining to the collection and treatment of Your information. In the event You do not agree with Our policies and practices, You can choose not to use Our Platform. By clicking on the "I Agree" button, You accept and agree to all the terms of and practices described in this Privacy Policy.

We reserve the right to amend the Privacy Policy from time to time. Please check the Privacy Policy periodically for any such amendments. We will alert You on such amendments by posting the date of such last update, placing a notice on our Platform, or by sending you a communication through an email or SMS to the contact details as provided by You at the time of registration on the Platform.

1. Application

This Privacy Policy applies to our Platform, services and all functionalities hosted on the Platform, unless specified otherwise.

2. Definitions:

- a. "Account" shall refer to the user-generated account that is hosted on the Platform and can be created subject to the submission of Personal Information and Sensitive Personal Information by the user.
- b. "Act" shall refer to the Information Technology Act, 2000, as amended from time to time.
- c. "Applicable Laws/ Law" shall mean any applicable statute, law, regulation, ordinance, rule, judgment, notification, rule of law, order, decree, bye-law, permits, licenses, clearance, approval, directive, guideline, consents, authorizations, policy, requirements, or other governmental restriction or any similar form of decision, or determination by, or any interpretation, or policy, having the force of law, whether in effect, as of the date of this Privacy Policy or thereafter, as amended from time to time;

- d. "Personal information" shall mean any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person, such as name, email and physical addresses, phone numbers
 - e. "Non-Personal Information" shall include Your geographic location, details of Your telecom service provider or internet service provider, the type of browser (Internet Explorer, Firefox, Opera, Google Chrome etc.), the operating system of Your system, device and the website You last visited before visiting the Platform, the duration of Your stay on the Platform along with the date, time of Your access etc.
 - f. "Sensitive Personal Information" of a person means such personal information which consists of information relating to: password(s); financial information such as Bank account or credit card or debit card or other payment instrument details; Information regarding bank transactions, statements of accounts, PAN Numbers, License numbers, tax-related information etc., and any detail relating to the above as provided to a body corporate for providing service; and any of the information received under above clauses by a body corporate for processing, storing or processed under lawful contract or otherwise.
3. Any capitalized words not defined herein shall have the same meaning as ascribed to it in the Terms of Use.
4. Children Under the Age of 18
The services provided by Us are not intended for children below the age of 18 years. We have a policy of not collecting Personal Information and Sensitive Personal Information from Children under 18 years of age if We have the knowledge of the same. If You are under the age of 18 years, we request You to not provide any information to Us or use any of the interactive and communication features provided by the Platform. If it comes to our knowledge that We have collected or received Personal Information or Sensitive Personal Information from a child under the age of 18 years without parental consent, We will delete that information.
5. Objective for Collection of Information
The Personal Information and Sensitive Personal Information is collected from users when the Platform is being accessed by You for the use of Our services, at the time of creation of Your Account or onboarding at Our Platform or if at any time You make changes to Your profile, Account etc. The objectives for collection of Personal Information and Sensitive Personal Information are following:
- a. To enhance Your experience of use of the Platform or other services provided by Us;
 - b. To respond to Your inquiries or fulfil Your requests for information about the various products and services offered on the Platform;
 - c. To provide You with information about products and services available on the Platform and to send You information, materials, and offers from Us;
 - d. To update You with important information regarding the Platform, changes in terms and conditions, user agreements, and policies or other administrative information.
 - e. To send You surveys and marketing communications that We believe may be of interest to You.
 - f. To personalize Your experience on the Platform by presenting advertisements, products and offers tailored to Your preferences.

- g. To analyse how Our services are used, to measure the effectiveness of advertisements, to facilitating payments.
 - h. To respond to legal, judicial, quasi-judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law.
 - i. To permit third parties who may need to contact users who have bought products from the Platform to facilitate installation, service and any other product-related support.
 - j. To determine any security breaches, computer contaminant or computer virus and to investigate, prevent, or act regarding illegal activities and suspected fraud.
 - k. To resolve disputes, if any.
- 6. Controller of Personal Information and Sensitive Personal Information
Any Personal Information or Sensitive Personal Information provided to or gathered by Us under this Privacy Policy will be stored and controlled by SMIN COMPOSITE TECH PRIVATE LIMITED.
- 7. Controller of Non-Personal Information
Any Non-Personal Information provided to or gathered by Us under this Privacy Policy will be stored, owned and controlled by Us.
SMIN COMPOSITE TECH PRIVATE LIMITED reserves the right to use the Non-Personal Information updated by the Users on the Platform and/or generated during the course of usage of the Platform, in any manner which it deems fit and in compliance with the Applicable Laws.
- 8. Information Accessibility
Please note that You may visit the Platform and access any information or data or part of the Platform which we authorise access to without having to provide any Personal Information or Sensitive Personal Information. However, when You set up an Account on Our Platform, we collect and store your Personal Information or Sensitive Personal Information which is provided by you from time to time. Our reason for the collection of such information is to enable You to have a hassle-free, efficient, safe and easy user experience. We may use Your Personal Information or Sensitive Personal Information to assist sellers in handling orders, assist Our logistics service providers to deliver products, process payments, communicate with You about orders, products, promotional offers, display customer reviews or recommend products that might be of interest to you or for other purposes mentioned in this Privacy Policy. The kinds of information We gather from You are listed below
 - a. Account Information: We may collect Your Personal Information such as email address, name, phone number etc., and Sensitive Personal Information provided by You to fulfil the Know Your Customer (“KYC”) requirements, etc. You may also add other information to Your Account, such as a profile name, profile picture, and status message.
 - b. Messages: If You use the chat facility available on the Platform, We will collect the communication exchanged between You and other users of the Platform, which may pertain to Your messages, photos, videos, files etc. or any queries raised on the Platform. You should be aware that the Personal Information and any Sensitive Personal Information that you voluntarily disclose on the chat facility and that is accessible to other users, could be collected and disclosed by others. We cannot take any responsibility for such collection and disclosure.

- c. Voice calls: We may record Your voice calls made to our customer care number, for maintaining quality and for audit purposes.
- d. Log Information: We collect Non-Personal Information about Your Account such as log files, and website, and performance logs and reports, when You use our Services or interact with others using our Services.
- e. Transactional Information: If You undertake a transaction on Our Platform, we may receive information and confirmations, such as payment receipts, billing address, product information and images, data from third party payment aggregators or gateways processing Your payment.
- f. Device and Connection Information: We collect device-specific Non-Personal Information such as e-mail address, Internet Protocol (IP), password, browser data, computer version, operating system, purchase history, the full Uniform Resource Locators (URL) clickstream to, through and from Our Platform (including date and time); cookie number; products You viewed or searched for; and any phone number used to call Our customer care number including phone number when You install our Application, access, or use Our Platform.
- g. Cookies: We may use cookies to operate and provide Our services, and improve Your experiences, understand how Our services are being used, and customize Our services. We may use cookies to know Your choices, such as Your language preferences, and customize Our services for You. You may refuse to accept browser cookies by activating the appropriate setting on Your browser.
- h. Status Information: We collect information about Your online and status message changes on our Services, such as Your "online status", Your "last seen status", and Your last updated status message.
- i. Third-Party Information: We receive information about You which is provided by other persons, which may include Your phone number from their mobile address book, or a message, sent messages to groups to which You belong; the updated delivery and address information from Our logistics service provider or other affiliated service providers, Account information, purchase or return information; search results and links, including paid listings and credit history information from credit bureaus, which we use *inter alia* to help prevent and detect fraud and to offer certain credit or financial services to some users. We work with third-party providers who help Us in operating, improving, understanding, customizing, supporting, and marketing Our services. When You use third-party services, their own terms and privacy policies will govern Your use of those services.

9. Sharing of Personal Information

Your Personal Information or Sensitive Personal Information is an important part of our business and We share the same with other entities only as described below

- a. Affiliated Services- We may share Your Personal Information or Sensitive Personal Information with Our affiliate service providers such as logistics, financing, insurance, private entities offering data validation services, data processing services, onboarding services, government and semi government agencies etc. who perform functions for You on the Platform; or in connection with processing credit card and other mode of payments etc; providing transactional services (pertaining to the products and services available on our Platform); providing customer care services; product listing services; facilitation of Our brand outreach programs or analysing Your data. These entities will only have access to Your

Personal Information or Sensitive Personal Information that is needed to perform their functions, and they may not use the said information for any other purpose. Further, these entities will be required to process Your Personal Information or Sensitive Personal Information in accordance with this Privacy Policy and as permitted by the Applicable Law.

- b. Promotional offers/marketing/advertisement- We may share Your Personal Information with Our affiliates for the purposes of marketing outreach and advertisement. However, We will not disclose Your Sensitive Personal Information to them for marketing purposes without obtaining prior explicit consent from You via email or an alert in your Account.
 - c. Business purpose- We may share Your Personal Information or Sensitive Personal Information with another business entity should We (or Our assets) plan to raise capital or seek investment, merge with, or be acquired by that business entity, or in case of re-organization, amalgamation, restructuring of our Should such a transaction be undertaken, such business entity (or the new merged/restructured entity) will be required to follow this Policy with respect to your Personal Information.
 - d. Legal compliance- We may share Your Personal Information or Sensitive Personal Information to comply with the Applicable Law, enforce our Policies and Agreements or when directed by any court, tribunal, regulator or any government authority or legal process. We may also share Your Personal Information or Sensitive Personal Information with other entities and government authorities for detecting, mitigating, investigate fraudulent activities related to our Platform.
 - e. With your consent- Other than as set out above, you will receive prior written intimation/notice via email or alert in your Account when information about You might be disclosed or transferred to third parties and You will have an opportunity to choose not to share/transfer such information.
10. By using or continuing to use the Platform you agree to Our use of Your Personal Information and Sensitive Personal Information in accordance with this Privacy Policy, as may be amended from time to time by Us in our discretion. You also agree and consent to Us collecting, storing, processing, transferring, and disclosing Your Personal Information and Sensitive Personal Information with third parties or affiliate service providers for the purposes set out in this Privacy Policy.

11. Links to Third-party Websites

Our Platform may provide links to other websites, many of which have their own privacy policies. Be sure to review the privacy policy on any such redirected website You're visiting. Some content or applications, including advertisements on Our Platform accessed by You while availing Our services are served by third parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may use cookies alone or other tracking technologies to collect information about You when You use their services. The information they collect may be associated with Your Personal Information or they may collect information about Your online activities over time and across different websites and other online services. They may use this information to provide You with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may use the data which they have accessed. If You have any questions about an advertisement or other targeted content, You should contact the responsible provider/advertiser directly.

12. Managing of Your Account and retention of Your Personal Information or Sensitive Personal Information

You may delete Your Account at any time or revoke Your consent to Our use of the information provided to Us, using Our Platform delete account feature.

We may retain some of Your Personal Information or Sensitive Personal Information after the deletion of Your Account or such data, only for legitimate business or legal purposes such as security, fraud prevention or financial record-keeping or as otherwise mandated under Applicable Law. When You delete Your Account or such data, We follow a deletion process to make sure that Your data is safely and completely removed from Our servers or retained only in anonymized form.

13. Options available to You at any time while using the Platform

You will always have access to Your Account information and Your purchase transactions in Our Platform for the limited purpose of viewing and, in certain cases, updating that information. This list will change as Our Platform evolves. In addition, You may at any time while using the Platform:

- a. Choose not to provide any information sought to be collected.
- b. Request to review and correct, amend or update Your Personal Information or Sensitive Personal Information. When You update such information, We usually keep a copy of the previous version for Our records.
- c. You can, at any time while using the Platform withdraw Your consent given earlier to Our Platform to use Your Personal Information or Sensitive Personal Information. However, such withdrawal of consent must be provided to Us in writing.

14. Data Security

We have employed robust, reasonable and up to date physical and electronic procedural, technical and administrative security measures to protect Your Personal Information and Sensitive Personal Information from loss, theft, unauthorised and unlawful interception and dissemination. Your information provided by You is stored on servers secured using Microsoft Azure. We maintain the security of Your information as per the International Standard.

We request You to undertake caution if You are providing Your Personal Information or Sensitive Personal Information over a chat forum or any publicly accessible part of the Platform. We urge You not to share Your Account details and password with anyone. It is Your responsibility to ensure Your Account details remain confidential and no unauthorised person gets access to these.

15. Conditions of Use

If You choose to avail Our services, such services and any dispute over privacy is subject to this Privacy Policy and Our terms of use, including limitation on damages, resolution of disputes and application of the laws of India.

16. Limitation on Damages

We shall be liable to pay actual damages only for such offences as are envisaged under the Act. You shall have the right to claim damages on account of any non-compliances by Us subject to sharing with us satisfactory legal evidences of our non-compliances and the validity of Your claim. Your right to claim shall be limited to statutory damages prescribed under the Act.

17. Disputes

Any disputes arising on account of or out of this Privacy Policy shall be governed by the

laws of India shall have exclusive and rightful jurisdiction to adjudicate upon all disputes arising out of this Privacy Policy.

18. Grievance officer

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

SCO 89 , 2nd Floor Sector 10 A, main, Khandsa Rd, Gurugram, Haryana 122001, India

Email: info@smincomposites.com. If You have questions or any grievances about Our Privacy Policy, please contact our Grievance Officer.