

**PRIVACY POLICY**  
**EFFECTIVE 21.07.2025**

**SANLAYAN TECHNOLOGIES PRIVATE LIMITED** (referred to as “we” or “Sanlayan” or “Company”), a company existing under the Companies Act, 2013, is the author and publisher of the internet resource, website –<https://www.sanlayan.com/> (the “Site”), and is a Company incorporated in 2023.

The vision is to become a strategic electronics company focused on developing indigenous technologies and to deliver cutting-edge electronics systems, meeting stringent technical specifications and quality standards.

This privacy policy (“**Privacy Policy**”) explains how we may collect, use, share, and protect the Personal Data of the users availing our Services on the Site (referred to as “you”, “your”, or “User(s)”).

This Privacy Policy and Terms of Service available at <https://www.sanlayan.com/> (“**User Terms**”) together constitute a legally binding agreement (“**Agreement**”) between you and **Sanlayan Technologies Private Limited**. These terms shall apply to and govern your visit to and use of the Site and any of its products or services, whether accessed through a computer or a mobile phone. This includes all information, recommendations, and services provided to you on or through the Site.

BY CONFIRMING THAT YOU ARE BOUND BY THIS PRIVACY POLICY (BY THE MEANS PROVIDED ON THIS SITE), BY AVAILING OUR SERVICES OR BY OTHERWISE GIVING US ANY OF YOUR INFORMATION WE MAY SEEK FROM TIME TO TIME, YOU AGREE TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY. **YOU HEREBY CONSENT TO OUR COLLECTION, USE, AND SHARING OF YOUR INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.** WE RESERVE THE RIGHT TO CHANGE, MODIFY, ADD, OR DELETE PORTIONS OF THE TERMS OF THIS PRIVACY POLICY, AT OUR SOLE DISCRETION, AT ANY TIME. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY AT ANY TIME, PLEASE REFRAIN FROM USING ANY OF OUR SERVICES OR PROVIDING US WITH YOUR PERSONAL INFORMATION. IF YOU USE THE SERVICES ON BEHALF OF SOMEONE ELSE (SUCH AS YOUR CHILD) OR AN ENTITY, YOU REPRESENT THAT YOU ARE AUTHORISED BY SUCH INDIVIDUAL OR ENTITY TO ACCEPT THIS PRIVACY POLICY ON SUCH INDIVIDUAL'S OR ENTITY'S BEHALF.

## **1. LEGAL PROVISION FOR A PRIVACY POLICY**

- A. This Privacy Policy is published in compliance with *inter alia* (i) the Digital Personal Data Protection Act, 2023; (ii) Section 43A of the Information Technology Act, 2000; (iii) Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the “**SPDI Rules**”); (iv) Rule 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011 (“**IG Rules**”), and other applicable rules, regulations and applicable laws as amended from time to time.
- B. This Privacy Policy states the following:
  1. The type of information that may be collected from the Users, including sensitive personal data or information;
  2. The purpose, means, and modes of usage of such information may be collected; and
  3. How and to whom we will disclose such collected information.

## **2. INFORMATION WE COLLECT AND PROCESS ON BEHALF OF THE USER**

We may collect personal information relating to you (“**Personal Data**”) as follows:

Some of the Services may require us to know who you are so that we can best meet your needs. When you access any of our Services, we may ask you to voluntarily provide us with certain information that personally identifies you or could be used to personally identify you. As of now, we do not collect any specific Personal Data, but we may collect the following data from time to time:

**A. Personal Data:**

1. Information our servers automatically collect when you access the Site, such as your IP address, your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site.
2. Information that is freely available in the public domain or accessible under the Right to Information Act, 2005, or any other law will not be regarded as personal information or sensitive personal data or information.

**B. Usage Data:**

We may collect usage data when you want to avail any of our Services through the Site.

**C. Device Information:**

This includes the name of the device, operating system, device identifiers, and browser you are using. Information collected may depend on the type of device you use and its settings.

**D. Third-Party Integrations:**

We may, in the future, provide the option for users to register an account, create a membership account, and utilize such accounts for the purpose of accessing and availing our Services, should these features be introduced in the future. You may also connect third-party integrations to your account, which may request certain permissions to access or send information to your account. Additionally, we may collect information regarding the types of integrations you enable within your account. It is your responsibility to review any third-party integrations you authorize. Any permissions granted by you that grant any third parties' access to your data, which may include but are not limited to granting third-party applications access to view, store, and modify your account data, under no circumstances and events, shall we be responsible for the acts of any third-party integration.

The Site may contain links to third-party websites or services. This Policy does not apply to such third-party sites, and we are not responsible for their privacy practices. We encourage you to review the privacy policies of those third parties before proceeding to such websites.

**E. Google or Other Calendar Integration:**

The site may have access to your Google Calendar and any other calendars you access via Google to enable features like the Meetings tool and event association with contacts in your account. The Site may be able to create, modify, and update your calendars and individual events.

**3. USE OF THE COLLECTED INFORMATION**

All the information provided to us by a User as may be required from time to time, including sensitive personal information, is voluntary. You understand that Sanlayan may use certain information of yours, which has been designated as 'sensitive personal data or information under the SPDI Rules, (a) for the purpose of providing you with the Services, and (b) for commercial purposes, and in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes.

We may collect and use the Personal Data for the following purposes:

1. To provide, manage, maintain, develop, and analyze our Services, or in connection with business transactions;
2. For promotional and marketing purposes, such as sending updates, newsletters, and offers related to the platform. You can opt out of receiving such communications at any time by sending an email to the concerned person for such action;
3. For contacting Users to take their feedback on our Services;
4. Analyzing anonymized information for commercial use;
5. To adhere to legal requirements, protect our rights and interests, and ensure the safety and privacy of our affiliates, you, or other parties.

**We may collect "sensitive personal data or information under the SPDI Rules, which requires your express consent. By affirming your assent to this Privacy Policy, you provide your**

**consent to such collection as required under applicable law. Our Services may be unavailable to you in the event such consent is not given.**

#### **4. DISCLOSURE OF PERSONAL DATA**

In certain circumstances, we may collect and provide your Personal Data to third parties without any notice to you unless required by the law:

1. **Vendors and Service Providers:** To support our business operations and perform specific services, we may collect and share Personal Data with vendors, service providers, and data analytics entities. This includes entities that provide hosting, customer service, cloud services, email communication, web analytics, and other IT services. These third parties will handle Personal Data strictly according to our directives and only while carrying out their designated functions.
2. **Business Transfers:** In the event of strategic activities such as mergers, reorganizations, bankruptcies, or changes in service providers, your Personal Data may be disclosed during due diligence and may be transferred to a successor or affiliate as part of the transaction, along with other business assets.

#### **5. PRIVACY STATEMENTS**

1. A condition of each User's use of and access to our Services is their acceptance of the Terms of Service, which also involves acceptance of the terms of this Privacy Policy. Any User who does not agree with any provisions of the same has the option to discontinue the Services provided by Sanlayan immediately.
2. Users' personally identifiable information, which you choose to provide on the Site as may be required, is used to help the Users describe/identify themselves. Other information that does not personally identify the Users as an individual is collected by Sanlayan from Users (such as patterns of utilization described above) and is exclusively owned by Sanlayan. We may also use any such information collected in an aggregated or non-personally identifiable form for research, statistical analysis, and business intelligence purposes, and may sell or otherwise transfer such research, statistical, or intelligence data in an aggregated or non-personally identifiable form to third parties. In particular, we reserve with ourselves the right to use anonymized User demographics information and anonymized User information for the following purposes:
  - (i) Analyzing such information for research and development of new technologies;
  - (ii) Using analysis of such information in other commercial product offerings of Sanlayan;
  - (iii) Sharing analysis of such information with third parties for commercial use.
3. You are responsible for maintaining the accuracy of the information you submit to us, as may be required from time to time, such as your contact information. If your Personal Data submitted to us on our request changes, you may correct, delete inaccuracies, or amend information by contacting us at [Compliance@sanlayan.com](mailto:Compliance@sanlayan.com). We will make good faith efforts to make the requested changes in our then-active databases as soon as reasonably practicable. If you provide any information that is untrue, inaccurate, out of date or incomplete (or becomes untrue, inaccurate, out of date or incomplete), or Sanlayan has reasonable grounds to suspect that the information provided by you is untrue, inaccurate, out of date or incomplete, Sanlayan may, at its sole discretion, discontinue the provision of the Services to you.
4. Sanlayan may periodically ask Users to complete surveys asking about their experiences with features of the Site and our Services. Our surveys may ask visitors for demographic information such as age, gender, and education. We use survey information for evaluation and quality improvement purposes, including helping Sanlayan improve the information and services offered. In addition, Users giving feedback may be individually contacted for follow-up due to concerns raised during the course of such evaluation. Demographic information and web log data may be stored for future evaluation and quality improvement activities.
5. While using the Site, with your permission, we may use the geo-location feature of your device or the same or similar features of the device you are using to access the Site. Sanlayan may share your location information with other third parties for the purpose of providing you with any of our Services. You may opt out of sharing information regarding

your location by sending an email to [Compliance@sanlayan.com](mailto:Compliance@sanlayan.com), however, this may affect your availing of any of our Services and lead to the provision of no Services.

6. Sanlayan takes your right to privacy very seriously and other than as specifically stated in this Privacy Policy will only disclose your Personal Data (if collected) in the event it is required to do so by law, rule, regulation, law enforcement agency, governmental official, legal authority or similar requirements or when Sanlayan in its sole discretion, deems it necessary in order to protect its rights or the rights of others, to prevent harm to persons or property, to fight fraud and credit risk, or to enforce or apply the User Terms.
7. To the extent necessary to provide Users with the Services, Sanlayan may provide their Personal Data to third-party contractors at their own discretion who work on behalf of or with Sanlayan to provide Users with such Services, to help Sanlayan communicate with Users, or to maintain the Site. Generally, these contractors do not have any independent right to share this information. However, certain contractors who provide services on the Site, including the providers of online communications services, will have the right to use and disclose the Personal Data collected in connection with the provision of these Services in accordance with their own privacy policies.
8. Sanlayan has implemented security policies, rules, and technical measures to protect the Personal Data that it has under its control from unauthorized access, improper use or disclosure, unauthorized modification, and unlawful destruction or accidental loss. However, for any data loss or theft due to unauthorized access to the User's electronic devices through which the User avails the Services, Sanlayan shall not be held liable for any loss whatsoever incurred by the User.

## 6. CONSENT ON REGISTRATION

If and when the Site provides options for registration of an account, membership options, or account usage, such services will be governed by the terms as may be intimated by Sanlayan to you.

## 7. THIRD-PARTY WEBSITES AND CONTENT

This Privacy Policy applies to the Site and Services that are owned and operated by Sanlayan. We do not exercise control over the sites that may be displayed as search results or links from within the Services. These other sites may place their own cookies or other files on the Users' computer, collect data, or solicit Personal Data from the Users, for which Sanlayan is not responsible or liable.

Accordingly, Sanlayan does not make any representations concerning the privacy practices or policies of such third parties or terms of use of such websites, nor does Sanlayan guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, messages or other materials available on such websites. The inclusion or exclusion does not imply any endorsement by Sanlayan of the website, the website's provider, or the information on the website. If you decide to visit a third-party website linked to the Website, you do this entirely at your own risk. Sanlayan encourages the User to read the privacy policies of such websites.

## 8. WEB BROWSER COOKIES

The Site may use cookies to store certain data (that is not sensitive personal data or information) that is used by us for the technical administration of the Site, research and development, and User administration. In the course of serving advertisements or optimizing services to its Users, Sanlayan may allow authorized third parties to place or recognize a unique cookie on the User's browser. The cookies, however, do not store any Personal Data of the User. We may use cookies to collect information about your browsing activities and enhance your user experience. You can manage your cookie preferences through your browser settings. Please note that blocking or disabling cookies may affect your ability to use certain features of our platform.

## 9. USE OF INFORMATION ON CANCELLATION OF ACCOUNT

If and when the Site provides options for account registration, membership, or account usage, cancellation of such accounts will be governed by the terms as may be intimated by Sanlayan to you.

## 10. CONFIDENTIALITY AND SECURITY

1. If any of your Personal Data is collected, the same will be maintained by Sanlayan in electronic form (*inter alia* using servers) on its or its employees' and partners' equipment. Such information may also be converted to physical form from time to time. We take



necessary precautions to protect your Personal Data both online and offline and implement reasonable security practices and measures that are commensurate with respect to the information being collected and the nature of Sanlayan's business.

2. Sanlayan makes all User information accessible to its employees only on a need-to-know basis.
3. Notwithstanding the above, Sanlayan is not responsible for the confidentiality, security, or distribution of your Personal Data by third parties outside the scope of our Agreement with any third parties. Further, Sanlayan shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond the control of Sanlayan including but not limited to, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of internet service or telephone service of the User etc.
4. However, no method of transmission over the internet or electronic storage is completely secure, and we cannot guarantee absolute security.

#### **11. CASUAL VISITORS NOTE**

1. No sensitive personal data or information is automatically collected by Sanlayan from any casual visitors of this website, who are merely perusing the site.
2. Nevertheless, certain provisions of this Privacy Policy are applicable to even such casual visitors, and such casual visitors are also required to read and understand the privacy statements set out herein, failing which they are required to leave the Site immediately.
3. If you, as a casual visitor, have browsed any page of this Site prior to reading the privacy statements set out herein, and you do not agree with them, we encourage you to use the "clear cookies" functionality of your browsers to ensure clearing/deletion. However, Sanlayan cannot guarantee, predict, or provide for the behaviour of the equipment of all the visitors of the Site.
4. You are not a casual visitor if you have willingly submitted any personal data or information to Sanlayan through any means, including email, post, or through the registration process on the Site. All such visitors will be deemed to be and will be treated as Users for the purposes of this Privacy Policy, in which case, all the statements in this Privacy Policy apply to such persons.

#### **12. CHANGE TO PRIVACY POLICY**

1. Sanlayan may update this Privacy Policy at any time. In the event, there are significant changes in the way Sanlayan treats the User's personally identifiable information, or in the Privacy Policy itself, Sanlayan will display a notice on the Site, so that you may review the changed terms prior to continuing to use the Services. If you object to any of the changes to our terms, and you no longer wish to avail any of our Services, you may contact us at [Compliance@sanlayan.com](mailto:Compliance@sanlayan.com). Unless stated otherwise, Sanlayan's current Privacy Policy applies to all information that Sanlayan has about you.
2. If a User uses the Services or accesses the Site or uses the Site after a notice of changes has been sent to such User or published on the Site, such User hereby provides their consent to the changed terms.

#### **13. INTERNATIONAL USER**

By using our Service, you understand and acknowledge that your Personal Data will be processed and stored in our facilities and servers in India and may be disclosed to our service providers and affiliates in other jurisdictions.

#### **14. CHILDREN'S AND MINOR'S PRIVACY**

Sanlayan strongly encourages parents to supervise the online activities of their minor children and consider using parental control tools available from online services and software manufacturers to help provide a child-friendly online environment. These tools can also prevent minors from disclosing their name, address, and other personally identifiable information online without parental permission. The Site is not intended for use by individuals under the age of 18. We do not knowingly collect personal information from children. If you become aware that a child has provided us with personal

information without parental consent, please contact us, and we will take steps to remove the information.

#### **15. LEGAL REQUIREMENTS**

We may share your Personal Data, including information about your interaction with our Services, with government authorities, industry peers, or other third parties (i) if required to do so by law or in the good faith belief that such action is necessary to comply with a legal obligation, (ii) to protect and defend our rights or property, (iii) if we determine, in our sole discretion, that there is a violation of our terms, policies, or the law; (iv) to detect or prevent fraud or other illegal activity; (v) to protect the safety, security, and integrity of our products, employees, or users, or the public, or (vi) to protect against legal liability.

#### **16. CONSENT TO THIS POLICY**

You acknowledge that this Privacy Policy is a part of the User Terms of the Site and the other Services, and you unconditionally agree that becoming a User of the Site and its Services signifies your assent to this Privacy Policy. Your visit to the Site and use of the Services are subject to this Privacy Policy and the User Terms.

#### **17. ADDRESS FOR PRIVACY QUESTIONS**

Should you have questions about this Privacy Policy or Sanlayan's information collection, use, and disclosure practices, you may contact the Privacy Officer at Name: Rohan Gala, and Email: [Compliance@sanlayan.com](mailto:Compliance@sanlayan.com). We will make reasonable efforts to respond promptly to any requests, questions, or concerns that you may have regarding our use of any of the collected Personal Data.

#### **18. CONTACT INFORMATION OF THE GRIEVANCE OFFICER**

If you have any grievance with respect to our use of your information, you may communicate such grievance to:

**Name: Rohan Gala**

**Email: [Compliance@sanlayan.com](mailto:Compliance@sanlayan.com)**

You can contact the Grievance Officer for any concerns or grievances related to the privacy policy or the handling of your personal information. We encourage you to provide specific details regarding your concern to facilitate a prompt and appropriate response. Please note that the Grievance Officer is appointed to address privacy-related concerns specifically. For general inquiries or support regarding the Services, we recommend reaching out to our customer support team through the designated channels provided on the Site. We are committed to addressing any privacy concerns in a timely and appropriate manner.