

XYMA Privacy Policy

Effective Date: July 1st, 2024

1. Introduction

XYMA Analytics Private Limited ("we," "us," "our," or "the Company") is dedicated to safeguarding the privacy and security of personal information for our customers, employees, and other stakeholders. This Privacy Policy details our practices regarding the collection, use, disclosure, and protection of Sensitive Personal Data or Information (SPDI), in accordance with applicable laws, including the Sensitive Personal Data or Information (SPDI) Rules, 2011.

2. Definitions

- **Sensitive Personal Data or Information (SPDI):** Information that includes passwords, financial details (such as bank account or credit card information), physical or mental health conditions, sexual orientation, medical records, biometric data, and any other data classified as sensitive under applicable law.
- **Personal Information:** Any data that identifies or can be used to identify an individual, such as name, contact details, and other personal identifiers.

3. Collection of SPDI

Purpose of Collection

We collect SPDI only for lawful purposes connected to our business operations and to enhance our services for users.

Types of SPDI Collected

- **Financial Information:** Bank account details, credit card numbers, and other payment-related data.
- **Personal Information:** Name, education details, contact number, email id, LinkedIn Id, Previous employment history etc.
- **Biometric Information:** Data such as fingerprints, retina scans, and facial recognition.

4. Use of SPDI

We use SPDI for the following primary purposes:

- **Service Provision:** To deliver and enhance our services based on user needs and preferences.
- **Transaction Processing:** To securely process transactions.
- **Legal Compliance:** To meet legal and regulatory obligations, including reporting and lawful disclosures.
- **Research and Analysis:** For internal research to improve our services.
- **Communication:** To keep users informed about their accounts, services, updates, and promotions.

5. Consent

By visiting our website or by providing their information, an individual consents to the collection, use, storage, disclosure and otherwise processing of their information on the website in accordance with this Privacy Policy. If the individual discloses to us any personal data relating to other people, such individual represents to us that they have the authority to do so and permit us to use the information in accordance with this Privacy Policy. The individual, while providing their personal data over the website or any partner platforms or establishments, consent to us (including our other corporate entities, affiliates, lending partners, technology partners, marketing channels, business partners and other third parties) to contact the individual through SMS, instant messaging apps, call and/or e-mail for the purposes specified in this Privacy Policy. The individual has an option to withdraw their consent that they have already provided by writing to the Grievance Officer at the contact information provided below. We request the individual to please mention “Withdrawal of consent for processing personal data” in their subject line of communication. We will verify such requests before acting on the request. Please note, however, that withdrawal of consent will not be retroactive and will be in accordance with the terms of this Privacy Policy, related terms of use and applicable laws. In the event an individual withdraws consent given to us under this Privacy Policy, we reserve the right to restrict or deny the provision of our services for which we consider such information to be necessary.

6. Disclosure of SPDI

Conditions for Disclosure

- **With Explicit Consent:** We disclose SPDI only with the explicit consent of the individual.
- **Legal Requirements:** SPDI may be disclosed to comply with legal obligations or regulatory authorities.
- **Protection Purposes:** To protect the rights, property, or safety of the Company or others.

Third-Party Disclosure

- We ensure that third parties who receive SPDI comply with data protection laws and maintain adequate security measures.

7. Data Storage and Security

Security Measures

- **Encryption:** We employ advanced encryption techniques for SPDI protection during transmission and storage.
- **Access Controls:** Strict access controls and authentication mechanisms limit SPDI access to authorized personnel only.
- **Security Audits:** Regular audits and vulnerability assessments are conducted to address security risks.
- **Secure Storage Solutions:** SPDI is stored in secure environments with robust safeguards.

Data Retention

- SPDI is retained only as long as necessary for the purposes it was collected, or as required by law.

8. Rights of Individuals

Access and Correction

- Individuals may access their SPDI and request corrections if it is inaccurate or incomplete.

Deletion and Withdrawal

- Individuals always have the right to refuse consent for the SPDI sought to be collected or can request SPDI deletion and withdraw consent, subject to legal and contractual restrictions. We will always respect such refusal or withdrawal, but it might mean that we are unable to perform all the services, arrangements or contracts with the individual and we will have the option to discontinue the same. We will inform the individual of these inabilities if they occur. We reserve the right to retain such SPDI as may be necessary for providing our pending services to the individual in accordance with this Privacy Policy and/ or if legally required, under the Information Technology Act, 2000, Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and other applicable laws.

Complaints

- Complaints about privacy practices can be lodged with the relevant data protection authority.

9. Compliance with SPDI Rules

Regular Review

- We review and update our privacy practices to ensure compliance with SPDI Rules and other regulations.

Employee Training

- We provide ongoing data protection and privacy best practices training for employees.

Audits

- Periodic audits are performed to ensure compliance with privacy practices.

10. Contact Information

For questions or concerns about this Privacy Policy or our data protection practices, please contact us at:

- **Email:** info@xyma.in
- **Grievance Officer:**
 - **Name:** Naznin Nisha Ansari
 - **Address:** XYMA Analytics Private Limited, B-Block, 4th Floor, IITM Research Park, Kanagam Road, Taramani, Chennai, Tamil Nadu-600113
 - **Email:** grievance@xyma.in

11. Updates to This Policy

This Privacy Policy was last updated on July 1st, 2024. We may update our privacy practices periodically and will notify you of significant changes as required by law.

12. Jurisdiction

By using our website, you agree that any disputes related to this Privacy Policy will be governed by the laws of India and subject to the jurisdiction of the courts in Chennai, India.