

Privacy Policy

[•] December, 2022

We are committed to your Privacy

1. We at Mlfirst Technologies Private Limited ("Tax Nodes/We") respect your privacy, take it seriously, and are committed to protecting your Personal Information (defined below).

What this Policy describes

- 2. This privacy policy ("Policy") explains
 - (i) what information we collect;
 - (ii) how we use it;
 - (iii) with whom we share it; and
 - (iv) the measures that we undertake to protect your information; when you use our website (www.taxnodes.com) or our mobile application (<a href="mailto:] App) ("Platform(s)"). The Policy does not apply to entities that TaxNodes does not own or control. You should review this Policy every time you provide us with Personal Information.

Guiding Principles

- 3. We adhere to the following principles to protect your privacy:
 - (i) We do not share, rent, trade or sell your Personal Information to third parties other than as described within this Privacy Policy.
 - (ii) We do not share your contact information with another user of the Website or the App, without your consent.
 - (iii) Any Personal Information that you provide will be secured by industry standard protocols and technology.

Disclosures and Grievances

- 4. The entity responsible for collecting and retaining information under this Policy is Mlfirst Technologies Private Limited a company incorporated under the laws of India, having its registered office at Office 1302, 13th Floor, Gala Empire, Opp TV Tower Drive-in, Memnagar, Ahmedabad GJ 380054 IN and having CIN No. U72900GJ2021PTC127597
- 5. For any queries regarding this Policy and the collection and use of Personal Information collected or processed under this Policy, you can write to our registered office mentioned above or by e-mail at care@taxnodes.com or by post at the address of our registered office.



6. By using the Platform, you consent to this Privacy Policy. If you do not agree with this Privacy Policy and choose to not provide us with your Personal Information, our ability to provide you with our services may be affected, in which case, you may not be able to use our Platform.

What is Personal Information?

7. **"Personal Information"** means any information including personally identifiable information or sensitive personal information that relates to you, which, whether directly or indirectly, in combination with other information available or likely to be available with us, is capable of identifying you.

What information do we collect?

8. The information we collect may be classified under the following categories :

| Sr. No: | Category of Information: | Description: |
|---------|--------------------------|---|
| (i) | Identification Details: | This may include your name and gender |
| (ii) | Contact Information: | This may include information such as your e-mail address, phone number, etc. |
| (iii) | KYC Information: | This may include information such as your Permanent Account Number, your Aadhar Number, Passport Details, Driver's License, etc. |
| (iv) | Employment Details: | This may include your employer details, your designation, etc. |
| (v) | Financial Information: | This may include information such as your bank account number, details about your source of income or wealth, documents submitted in relation to such details, etc. |
| (vi) | Location Data: | This may include information about the location of the IP address or the location details provided by you. |
| (vii) | Account Details: | This may include information such as your login details, profile information, or the details of your interaction with our platform. |
| (viii) | Transaction Details: | This may include information about the transactions you undertake on the Platform such as transaction ID, amounts etc. |



| (ix) | Device and Network Data: | This may include information such as your IP |
|------|--------------------------|---|
| | | Address, browser details, IMEI number, the operating system of your device, etc |
| | | operating system of your device, etc |
| (x) | Usage and Analytics Data | This includes information such as the |
| | | Platform usage pattern, user analytics or other similar data points. |

How do we collect your information?

- 9. We may collect or receive your information in the following ways:
 - (i) *Information you provide us:* You may provide us with your information so as to enable us to provide you the services.
 - (ii) *Information we generate:* We may use in-house or third-party analytics tools to *help* us track the usage of our services or interactions with our Platform.
 - (iii) *Information we receive:* We may receive your information from select third parties including our subcontractors and vendors; or other websites or applications we operate or the other TaxNodes services we provide
- 10. We may also collect anonymized non-personally identifiable information on the Platform that allows us to improve our TaxNodes services.
- 11. All the data and/or information you share with us must be accurate and complete. You shall promptly inform TaxNodes in case of any change to your data or information which may impact the provision of our services. We shall not be responsible or held liable for any loss or damage that may occur to you or other third parties on account of provision of incorrect data or information provided by you.

When do we collect your information?

12. We may ask you to provide us with your information if and when: (i) you register and make an account on the Platform, (ii) correspond with us by phone, e-mail chat or otherwise (iii) subscribe to TaxNodes's newsletter, if applicable, (iv) we troubleshoot problems reported by you (v) respond to a survey or fill out a form on the Platform.

What purposes do we use your information for?

13. Any of the information the Website collects from you may be used for one of the following purposes:

| Sr. No | Purpose | Description | |
|--------|--------------------------|--|---|
| (i) | For the provision of our | • To provide TaxNodes Services and to [·]; | |
| | services: | • To personalize your experience on th | e |
| | | Platform; | |



| | | To improve the Platform or the features of the Platform; To improve customer service. |
|-------|--|---|
| (ii) | For verification and security purposes: | To verify and process transactions on the Platform; To update and back-up our records; To enhance the security of our Platform and keep the same safe and secure; |
| (iii) | For the purpose of our internal operations: | To run our Platform and for other internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; To detect and protect against error, fraud and other criminal or illegal activity, collect fees owed, enforce our terms and conditions; prevent abuse of our services, prevent violation of the rights of third parties, other users or the general public; |
| (iv) | For the purpose of communications and marketing: | To notify you about changes to our services or Platform; To understand the effectiveness of advertising we provide and carry out; To send you information and updates pertaining to your orders, To send you occasional news, updates, and related product or service information of TaxNodes, as applicable; To send you relevant marketing material, if applicable. |
| (v) | For legal purposes: | To comply with any statutory or regulatory requirement; To prevent and identify suspicious or other illegal transactions and to mitigate risks relating to money laundering and other illegal activities. |

- 14. Your Personal Information, whether public or private, will not be sold, exchanged, transferred, or given to any other entity. You hereby consent and allow TaxNodes to share your information for the following purposes:
 - (i) for the purpose of delivering the purchased product or service requested by you from the Platform;



- (ii) for administering a contest, promotion, survey or other feature; and
- (iii) for sending periodic emails and other communications.

How do we protect your information?

- 15. We implement a variety of security measures to maintain the safety of your Personal Information obtained by us from you. We take appropriate technical and organisational measures, proportionate to the risk possessed, to protect your information. This includes implementation of NIST and ISO 27001 frameworks. We also undertake a regular comprehensive independent audit of our security measures.
- 16. We offer the use of a secure server. Where applicable, all supplied sensitive information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our payment gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential. You are solely responsible for the authenticity of the Personal Information supplied by you, and we are not liable for the said authenticity under any circumstances whatsoever.
- 17. However, no internet or electronic transmission is ever fully secure or error-free. We expressly disclaim any liability for any unauthorized access or use of any information, if such access or use has been done despite us employing all commercially reasonable efforts, in accordance with applicable law.

Do we use cookies or respond to Do not track requests?

- 18. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser that enables the site or service provider's systems to recognize your browser and capture and remember certain information. You may have the option on disabling cookies on your browser.
- 19. We may use cookies to help us to understand, remember and save your preferences for future visits.
- 20. We might not respond to a "Do Not Track" signal in any particular way, since there is no common understanding on what such a signal is supposed to mean.

Do we disclose any information to outside parties?

- 21. We may host, transfer and process data, including Personal Information, in India, Singapore and in other countries that we use to operate and manage our services.
- 22. We do not sell, trade, or otherwise transfer your Personal Information to third parties for profit. However, we may share the information we collect on an as-needed basis with trusted third parties and subcontractors who assist us in operating the Platform, conducting our business, or servicing you.



- 23. We ensure that such third parties agree to keep this information confidential and that they ensure the same level of data protection that is adhered to by TaxNodes.
- 24. Accordingly, we may share your information with:

| Sr. No | Category | Description |
|--------|-----------------------------|---|
| (ii) | Cloud Platforms | We may use third-party cloud service providers to store and process your information, including but not limited to Microsoft Azure & Amazon Web Services |
| (iii) | Analytics Platforms | We may use certain third-party applications to perform analytics-related tasks. Such platforms include, but are not limited to Google Analytics. |
| (iv) | Group Companies | We may provide some or specific parts of our services through our group companies. So, we may share your information with our group companies. |
| (v) | Law Enforcement Authorities | We may share your information with law enforcement agencies, government officials, regulatory bodies, courts, banks, self-regulatory organizations and other similar entities to comply with our legal obligations. |

25. We may share non-personally identifiable information with other parties. We also use certain information in an aggregated form across users to compile statistical and demographic profiles for our business and marketing activities.

Third party links

26. Occasionally, at our discretion, we may include or offer third party products or services on the Platform. These third party sites may have separate and independent privacy policies. We have no responsibility or liability for the content and activities of these third party sites. Nonetheless, we seek to protect the integrity of the Platform and welcome any feedback about these third party sites.

Your Rights:

- 27. You have the following rights with respect to your Personal Information:
 - (i) Right of access You can ask us for copies of your Personal Information being processed or retained by us.



- (ii) Right to rectification You can ask us to rectify inaccurate or incomplete Personal Information about you (which you cannot update without our assistance).
- (iii) *Right to withdraw consent:* You have the option of not providing your Personal Information to TaxNodes. You can also withdraw your consent at any time. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.
- 28. In order to exercise any of your rights you may send us an email at care@taxnodes.com detailing your request. We may undertake additional measures to confirm your identity.
- 29. If you choose not to provide your Personal Information or to withdraw your consent, our ability to provide you the services may be affected and we may not be able to provide you the access to our Platform or the services therein.

Other Information about our Privacy Practices:

- 30. *Retention*: We will retain your information as long as needed or permitted under applicable laws, in light of the purposes mentioned above, subject to our compliance with this Policy. Among other criteria, we may determine the retention period based on the length of the ongoing relationship with you. We may further retain and use this Personal Information as necessary to comply with our legal obligations.
- 31. *Changes to Privacy Policy*: If we decide to change/amend/modify the Privacy Policy, we will post those changes, and update the Privacy Policy modification. The updated Privacy Policy will be intimated to you in the manner required by law. In any case you must look at this Privacy Policy regularly to check for such changes.
- 32. *Business Transaction*: We may assign or transfer this Policy, and your Personal Information, in the course of corporate divestitures, mergers, acquisitions, bankruptcies, dissolutions or similar transactions or proceedings, provided that the recipient of such information will continue to be bound by the terms of this Policy.
- 33. *Governing Law*: This Privacy Policy shall be governed by Indian laws, in particular, the Information Technology Act, 2000 and rules and regulations framed thereunder. Any dispute that may arise from this Privacy Policy shall be subject to the exclusive jurisdiction to the courts of Bangalore, India.