



A unit of Inclusion First Consultancy Private Limited  
www.thepridecircle.com  
PAN: AAECI9693N | GSTIN: 27AAECI9693N1ZM

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## DATA PROTECTION AND PRIVACY STATEMENT

This website [www.thepridecircle.com/allychallenge](http://www.thepridecircle.com/allychallenge) (“#AllyChallenge 2022”) and all of the tools and services on this website are owned and operated by Inclusion First Pvt. Ltd. and all its units (the “Company”)

At the Company, we value the trust you place in us when you visit one of our website(s) or use one of our web services. Part of our commitment to transparency and integrity is making sure you understand what data we collect, how we use it and how it may be shared. We are committed to compliance with data protection laws.

This Data Protection and Privacy Statement (“Policy”) describes how we collect and use your personal information when you visit our website(s), use our mobile and/or web application(s) or e-platform(s), or call us on the phone. In this Policy, “we” and “our” references the Company and “you” and “your” references any person who uses any of our website(s), service(s) and/or application(s).

By visiting #AllyChallenge 2022 or any of its related platform(s), application(s) or website(s) (Collectively referenced as the “Sites”) and/or licensing and using our products and services including, but not limited to, the aforementioned Services, you accept the practices described in the Policy. This Policy applies to the use of any of the Company’s websites or services which either link directly to this Policy, display this Policy, or otherwise indicate that this Policy applies (collectively referenced as “Sites and Services”)

### NOTICE OF COLLECTION

We want you to know that we collect personal information actively and passively, and we sometimes obtain information from third-party sources (“Your Data”). While you access and use our Sites and Services, you provide us with or we can access any and all kinds of information, which allow us to identify you, including without limitation, your name, age, surname, email address, telephone number, contact details, type of device, organisation name (“Your Personal Data”).

#### 1. Information You Give Us

We collect certain “Personally Identifiable Information” from you when you use our Sites and Services or sign up to our Services, that can be used to identify you, such as your name, email address, mailing address, telephone number, and any other information that we deem relevant for the purpose of providing you with our Services or which you provided to use voluntarily. This category also includes information tied to your identity that you provide us through other means, such as emails to our support service.

#### 2. Information We Get from Others

We may get information about you from other sources and add this to information we get from your use of our Sites and Services.



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### 3. Information Automatically Collected Through the Use of the Site

Whenever you visit our Sites and Services, we may automatically collect “Non-identifying Information” from you, such as your referring URL, browser, operating system, language preference, cookie information, and Internet Service Provider. We may also collect data about you provided by analytics and advertising services, as well as data collected by social media platforms. Without a subpoena, voluntary compliance on the part of your Internet Service Provider, or additional records from a third party, this information alone cannot usually be used to identify you.

### 4. Information About Use of Our Sites and Services by Consumer Users and Their End Users

If you are a consumer user of our Sites and Services and have subscribed to (including any non-productive evaluation/pilot use of) or licensed any of our services, we will collect certain analytics and operational data and information, including data and information regarding your access to or use of the services, e.g., performance statistics and usage data, (“Analytics and Operational Data”) pertaining to content that is entered into, submitted to, uploaded to, or transmitted using the services by you, on your behalf, or by your end users and any information you submit in connection thereto (“Customer Content”) (i) for purposes of analysing use of the Sites and Services by you and your end users and (ii) to operate, maintain, and improve our Sites and Services.

### NOTICE OF USE OF COLLECTED INFORMATION

We use your information in the following ways:

1. To manage your registration as a user of our Sites and Services
2. to provide, update, maintain, improve and protect our Sites and Services, including to operate certain features and functionality of the Sites and Services, to prevent or address service errors, security or technical issues, analyse and monitor usage, trends and other activities;
3. for billing, account management and other administrative matters;
4. to send information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages;
5. to respond to your support requests, comments and questions;
6. to control unauthorized use or abuse of the Sites and Services, if we have a good faith belief, or have received a complaint alleging that your data is in violation of acceptable use regulations;
7. to communicate directly with you, including by sending you newsletters, promotions and special offers or information about new products and services. You may, at any time, request to opt-out of receiving future emails or notifications from us, by contacting us.



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## USER WARRANTY

You hereby guarantee that your data, as provided by you, is true and exact and you agree to report any change or modification thereto. Any loss or damage caused to our Sites and Services or to us or to any third party through the communication of erroneous, inaccurate, or incomplete information on the registration forms shall be your sole responsibility.

## NOTICE OF ACCESS, SHARING AND SECURITY

We may share or transfer your personal information to third parties only in the following limited circumstances:

### 1. With Third-Party Applications Approved by You

We will display your Data within the Sites and Services as directed by you. If you elect to use a third-party application through the Sites and Services, then we may share or disclose Your Data with that third-party application as directed by you. Please remember that we are not responsible for the privacy practices of such third parties so you should make sure you trust the application and that it has a privacy policy acceptable to you.

### 2. Links to Other Website(S)

Our website(s) may contain links to other website(s) of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website(s). Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website(s) in question.

### 3. With Trusted Service Providers and Business Partners.

We may utilize trusted third-party service providers to assist us in delivering, improving, protecting and promoting the Sites and Services. For example, we may use third parties to help host our Services, send out email updates, perform analyses related to the operation of the Services, or process payments. These third-party service providers may have access to Your Data for the limited purpose of providing the service we have contracted with them to provide. We may share aggregated and/or anonymized data with third party providers for their own uses, but do not share individual, attributable data to third parties for their own use. They are required to have a privacy policy and security standards in place that are at least as protective of your information as is this Policy.



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#### 4. In Connection with a Sale or Change of Control.

If the ownership of all or substantially all of our business changes, we may transfer your information to the new owner so that the Sites and Services can continue to operate. In such case, your information would remain subject to the promises and commitments contained in this Policy until such time as this

Policy is updated or amended by the acquiring party upon notice to you.

#### 5. Other Access to or Disclosure of Your Information

We restrict access to any data and content you transmit to our Sites and Services or is otherwise made available via the Sites and Services to our employees, payment processors, contractors and agents who need to know that information in order to perform the Sites and Services. All of these individuals are subjected to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

#### 6. Security and Information Protection

We take security seriously. We take various steps to protect information you provide to us from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the information we collect, process and store, and the current state of technology. We use commercially reasonable and industry-standard physical, managerial, and technical safeguards to preserve the integrity and security of your information.

#### ACCESS FROM OUTSIDE INDIA

If you are accessing or using the Site and Services from outside India, please be aware that collected information may be transferred to, stored in, and processed in India (where certain or all of our and our service providers' servers and databases are located and operated). The data protection and related laws and regulations of India might not be as comprehensive as those in the country from which you are accessing the Site or services.

#### LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION (EUROPEAN ECONOMIC AREA VISITORS ONLY)

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described in this Policy will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to process the personal information collected from you or may otherwise need the personal information to protect your vital interests or



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those of another person. If this is the case, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to conduct our business and communicate with you as necessary to provide our services to you and for our other legitimate interests, for instance, responding to your queries, improving our services or for the purpose of detecting or preventing illegal activities.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, or object to the use of your Personal Information on these grounds, please contact us at the address provided under the “Contact Information” heading below.

## NO CHILDREN UNDER AGE 16

The Sites and Services are not intended for use by anyone under the age of 16, nor do we knowingly collect or solicit personal information from anyone under the age of 16. If you are under 16, you may not attempt to register for the Sites and Services or send any information about yourself to us, including your name, address, telephone number, or email address. In the event that we confirm that we have collected personal information from someone under the age of 16 without verification of parental consent, we will delete that information promptly. If you are a parent or legal guardian of a child under 16 and believe that we might have any information from or about such a child, please contact us at the email address provided under the “Contact Information” heading below.

## CHANGES TO THE PRIVACY POLICY

We reserve the right to change our Policy at any time. If we make changes, we will post them and will indicate on this page the policy’s new effective date. If we make material changes to this policy, we will notify you by email or through notice on the Sites and Services.

## DATA PROTECTION RIGHTS

We undertake to respect the confidentiality of your Personal Data and to guarantee that you can exercise your rights. You may exercise your rights of access, rectification, cancellation and opposition by contacting us at the email address provided under the “Contact Information” heading below.

If you decide to exercise these rights, and if part of the personal data you provided was your email address, we would ask you to please specify this circumstance in your written request, indicating the email address from which you wish to exercise your right rights of access, rectification, cancellation and opposition.



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## YOUR ACCEPTANCE OF THESE TERMS

By using our Sites and Services, you signify your acceptance of this policy and terms of service. If you do not agree to this Policy, please do not use our Sites and Services. Your continued use of our Sites

and Services, including following the posting of any changes to this Policy, will be deemed as your acceptance of those changes.

## CONTACT INFORMATION.

We welcome your comments or questions about this Policy. You may contact us via email at [contact@thepridecircle.com](mailto:contact@thepridecircle.com) or directly request support on our Sites and Services.