**InnovAccer Privacy Policy effective 1st April 2014**

**Overview**

Your privacy is very important to us. We do not publish, sell or rent your personal information to third parties for their marketing purposes without your explicit consent. Please read this privacy policy to learn more about the ways in which we use and protect your personal information.

The privacy practices of this statement apply to our services available under the domain and subdomains of www.InnovAccer.com (the "Site") and apply generally to our affiliates, subsidiaries or joint venture websites. By visiting this website you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree please do not use or access our Site.

This Privacy Policy describes the information, as part of the normal operation of our services, we collect from you and what may happen to that information. Although this policy may seem long, we have prepared a detailed policy because we believe you should know as much as possible about InnovAccer's practices so that you can make informed decisions. Our associates, affiliates, subsidiaries and joint ventures operate under similar privacy practices as described in this Privacy Policy and, subject to the requirements of applicable law, we strive to provide a consistent set of privacy practices throughout the global InnovAccer trading community.

By accepting the Privacy Policy and the User Agreement in registration, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the terms of the User Agreement. This Privacy Policy is effective upon acceptance in registration for new registering users, and is otherwise effective on **1st April 2014** for all users.

1. **Your Privacy - Our Commitment**

At InnovAccer, we are extremely proud of our commitment to protect your privacy. We value your trust in us. We will work hard to earn your confidence so that you can enthusiastically use our services and recommend us to friends, colleagues, and significant others. Please read the following policy to understand how your personal information will be treated as you make full use of our Site.

2. **InnovAccer Privacy Guarantee**

InnovAccer promises that we will not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. From time to time we may reveal general statistical information about our Web site and visitors, such as number of visitors, number and type of goods and services purchased, etc. Your trust and confidence are our highest priority.

3. **Information we collect**

When you use our Site, we collect and store your personal information from you. Our primary goal in doing so is to provide a safe, efficient, smooth and customized experience. This allows us to provide services and features that most likely meet your needs, and to customize our Site to make your experience safer and easier. Importantly, we only collect personal information about you that we consider necessary for achieving this purpose.

In general, you can browse the Site without telling us who you are or revealing any personal information about yourself. Once you give us your personal information, you are not anonymous to us. To fully use our Site, you will need to register using our online registration form, where you may be required to provide us with your name, date of birth, contact number, email id, user id, password, residence/place of business information, designation, organization details, billing information, shipping information, bank account details and other personal information as indicated on the forms throughout the Site. Where possible, we indicate which fields are required and which fields are optional. You always have the option to not provide information by choosing not to use a particular service or feature on the Site.

We may automatically track certain information about you based upon your behavior on our site. We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve our users. This information is compiled and analyzed on an aggregated basis. This information may include the URL that you just came from (whether this URL is on our site or not), which URL you next go to (whether this URL is on our site or not), your computer browser information, and your IP address.

We use data collection devices such as "cookies" on certain pages of the Site to help analyze our web page flow, measure promotional effectiveness, and promote trust and safety. "Cookies" are small files placed on your hard drive that assist us in providing our services. We offer certain features that are only available through the use of a "cookie". We also use cookies to allow you to enter your password less frequently during a session. Cookies can also help us provide information that is targeted to your interests. Most cookies are "session cookies," meaning that they are automatically deleted from your hard drive at the end of a session. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on the Site and you may be required to reenter your password more frequently during a session.

Additionally, you may encounter "cookies" or other similar devices on certain pages of the Site that are placed by third parties. For example, if you view a web page created by a user, there may be a "cookie" placed within that web page. We do not control the use of cookies by third parties.

If you choose to bid, buy or sell on the Site, we collect information about your bidding, buying and selling behavior. We also collect other users' comments about you in our feedback area.

If you choose to post messages on our message boards or other message areas or leave feedback for other users, we will collect that information you provide to us. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Site, we may collect such information into a file specific to you.

If you register for the Site on another web site or use a web site providing a service for InnovAccer or a web site that helps facilitate your activity on the Site, that web site may provide personal information about you and your transactions back to us.

4. **Our use of your information**

We use your personal information to facilitate the services you request. We use your personal information in the file we maintain about you, and other information we obtain from your current and past activities on the Site to: resolve disputes; troubleshoot problems; help promote safe trading; collect fees owed; measure consumer interest in the services provided by us, inform you about online and offline offers, products, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our User Agreement; and as otherwise described to you at the time of collection. At times, we may look across multiple users to identify problems or resolve disputes, and in particular we may examine your personal information to identify users using multiple User IDs or aliases. We may compare and review your personal information for errors, omissions and for accuracy.

You agree that we may use personal information about you to improve our marketing and promotional efforts, to analyze site usage, improve the Site's content and product offerings, and customize the Site's content, layout, and services. These uses improve the Site and better tailor it to meet your needs, so as to provide you with a smooth, efficient, safe and customized experience while using the Site.

You agree that we may use your personal information to contact you and deliver information to you that, in some cases, are targeted to your interests, such as targeted banner advertisements, administrative notices, product offerings, and communications relevant to your use of the Site. By accepting the User Agreement and Privacy Policy, you expressly agree to receive this information. If you do not wish to receive these communications, we encourage you to opt out of the receipt of certain communications in your profile. You may make changes to your profile at any time.

5. **Our Disclosure of your information**

We may also use your information to deliver information to you that, in some cases, are targeted to your interests, such as new services and promotions. The following are examples of some categories of persons to whom we would share your information with from time-to-time.

1. **Internal Service Providers.**

We may use third parties that we refer to as internal service providers to facilitate or outsource one or more aspects of the business, product and service operations that we provide to you on the Site (e.g., search technology, discussion boards, bill collection, affiliate and rewards programs) and therefore we may provide some of your personal information directly to these internal service providers. These internal service providers' are subject to confidentiality agreements with us and other legal restrictions that prohibit their use of the information we provide them for any other purpose except to facilitate the specific outsourced Site related operation, unless you have explicitly agreed or given your prior permission to them for additional uses. In some instances, the internal service provider may collect information directly from you (such as for Site surveys or for a co-branded credit card). In these cases, you will be notified of the involvement of the internal service provider, and all additional information you provide them and their additional uses will be strictly up to you. If you provide additional information to an internal service provider directly, then their use of your personal information is governed by their applicable privacy policy.

2. **Legal Requests**

We cooperate with law enforcement and regulatory inquiries, as well as other third parties to enforce laws, such as: intellectual property rights, fraud and other rights, to help protect you and the community from bad actors. Therefore, in response to a verified request by law enforcement or other government officials relating to a criminal investigation or alleged illegal activity, we can (and you authorize us to) disclose your name, city, state, telephone number, email address, UserID history, fraud complaints, and bidding and listing history without a subpoena. Without limiting the above, in an effort to respect your privacy and our ability to keep the community free from bad actors, we will not otherwise disclose your personal information to law enforcement or other government officials without a subpoena, court order or substantially similar legal procedure, except when we believe in good faith that the disclosure of information is necessary to prevent imminent physical harm or financial loss; or report suspected illegal activity. Further, we can (and you authorize us to) disclose your name, street address, city, state, zip code/pin code, country, phone number, email, and company name to Intellectual Property right's owners under confidentiality agreement, as we in our sole discretion believe necessary or appropriate in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity.

Due to the existing regulatory environment, we cannot ensure that all of your private communications and other personal information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (without limiting the foregoing), we may be forced to disclose personal information to the government or third parties under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your personal information that they collect from the Site. Therefore, although we use industry standard practices to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private.

InnovAccer and our users do not tolerate spam. Therefore, without limiting the foregoing, you are not licensed to add an InnovAccer user-even a user who has purchased an item from you-to your mail list (email or physical mail) without their express consent after adequate disclosure.

**What about children's privacy?**

Children are not eligible to use our Site and we ask that minors (under the age of 13) do not submit any personal information to us. If you are under the age of 13, you cannot subscribe for any platform on the Site except as provided as per the terms and conditions of the platform. If you wish to subscribe any platform on the Site, such subscription may be made under the supervision of your legal guardian or parents who have registered as users of the Site provided that such subscription is not in relation to any adult material/mature audience items displayed on the Site, the subscription of which to/by minors is strictly prohibited

**Access or change your personally identifiable information**

To protect your privacy and security, we will verify your identity before granting access or making changes to your personally-identifying information. If you have registered your profile on InnovAccer, your InnovAccer ID and Password are required in order to access your profile information.

**Security**

When you place orders, make payments, or access your account information, we offer the use of a secure server. The secure server software (SSL) encrypts all information you put in before it is sent to us. Furthermore, all of the customer data we collect is protected against unauthorized access. To prevent unauthorized access, maintain data accuracy, and ensure correct use of information, we will employ reasonable security practices and procedures and current Internet security methods and technologies in compliance with Information Technology Act, 2000 and rules made there under.

**Your Consent:** By using the Site and/ or by providing your information, you consent to the collection and use of the information you disclose on the Site by InnovAccer in accordance with this Privacy Policy, including but not limited to Your consent for sharing your information as per Clause 5 sub clause 1: Internal Service Providers mentioned above.

If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

**Name and address of the entity collecting and retaining Your Information**

InnovAccer Management Private Limited

D-66, First Floor

Sector 63, Noida

UP, India – 201301

[info@innovaccer.com](mailto:info@innovaccer.com)

+91-120-4311139

and

InnovAccer Inc.

303, 1322 Shattuck Avenue  
Berkeley, CA 94709  
United States

Grievance Officer:

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are published on the Website.

**Tell us what you think**

At InnovAccer, we welcome your questions and comments regarding our privacy policy. You may contact InnovAccer at info@innovaccer.com