

Privacy Policy

Welcome to the privacy policy for Saadhana, which is owned, managed and operated by Prarambhya Commune Private Limited. Unless we link to a different policy or state otherwise, this Privacy Policy applies when you visit or use the Saadhana website <https://saadhana.ai>, mobile applications, APIs or related services (“**Services**”).

Prarambhya Commune Private Limited together with its Affiliates (“**We/Us/Our**”) are engaged in the business of providing travel concierge services in the spiritual travel sector.

This Privacy Policy is effective as of 17th Jan,2025.

We request you (**the visitor and/or user of Saadhana**) to read this Privacy Policy in conjunction with the Terms of Use document. You are requested and required to thoroughly read and understand this Privacy Policy, as amended from time to time, prior to using Saadhana.

We respect your privacy and want you to understand how we collect, use, and share your data during your usage of Saadhana. This Privacy Policy covers our data collection practices and describes your rights to access, correct, or restrict our use of your personal data.

We are the data controller for all data collected from when you utilise the Services. Prarambhya Commune Private Limited is a private company registered in India, with the registered office at Chikkadpally, Hyderabad. You may get in touch with our privacy team at admin@saadhana.org or on 7989028632.

By using the Services, you agree to the terms of this Privacy Policy. You shouldn’t use the Services if you don’t agree with this Privacy Policy or any other agreement that governs your use of the Services. Your continuous use of the Services shall be deemed as your continuous acceptance of this Privacy Policy.

1. Legal Basis for Processing Data

1.1. We process your data on the basis of the following:

- (a) Your explicit consent for processing your data (as mentioned in Section 2 below), and for the purposes mentioned in Section 4 below;
- (b) For the performance of contracts entered into by you for providing any of the Services; and
- (c) Our legitimate interests, i.e. registering and administering accounts on our Services to provide you access to all content, updates and services you have purchased, and to facilitate the efficient running and operation of our business.

2. What Data We Collect

We collect certain data from you directly, like the information you enter yourself including your contact details. We also collect some data automatically, like information about your device and what parts of our Services you interact with or spend time using.

2.1 Data You Provide to Us

We may collect different data from or about you depending on how you use the Services. Here are some examples to help you better understand the data we collect.

- (a) When you create a new account or update an existing account on the website / mobile application, we collect the following data you provide directly:
 - (i) Full name
 - (ii) Email address
 - (iii) A unique password
 - (iv) IP address
- (b) When you sign in to your pre-registered account on the website/ mobile application, each time we request you to provide us your registered email address and unique password.
- (c) If you forget your unique registered password or email address, we may send you a one-time-password to your registered mobile number to help you create a new unique password.
- (d) When you avail a service on the website or mobile application, we collect the following data you provide directly:
 - (i) Email address
 - (ii) Phone number
 - (iii) Complete address
 - (iv) Full name
 - (v) Company name of the purchaser
 - (vi) Google location of the purchaser's address
 - (vii) Payment details
- (e) To ensure the security and proper functionality of our services, we collect one-time passwords (OTP) from you when you initiate or terminate the use of our services. The OTP is collected solely for the purpose of verifying your identity and authorizing the requested action. This information is not stored permanently and will be used only during the transaction process to maintain the integrity of the service.
- (f) Shared content: Parts of the Services let you share content publicly, including by sharing your testimonial along with your full name. Such shared content may be publicly viewable by others depending on where it is posted.
- (g) Your information linked to your account, including but not limited to your order history, contact details, shipping and billing address, payment details (only upon your explicit written consent), may be retained by us in providing you efficient Services on a continuous basis.
- (h) If you make payments, we collect certain data about your payment (such as your name and email id) as necessary to process your payment. You must provide certain payment and billing data directly to our payment processing partners, including your name, credit card/

debit card information, billing address, and zip code. For security, we do not collect or store sensitive cardholder data, such as full credit card numbers or card authentication data.

- (i) We may obtain certain information through your social media or other online accounts if they are connected to your Saadhana account. For e.g., if you wish to access our social media links on the website/mobile application, you will be redirected to a third-party side of the respective social media, and may be required to log-in using your existing social media account, to access our social media profiles, or use other functions. Those platforms and services make information available to us through their APIs. The information we receive depends on what information you (via your privacy settings) or the platform or service decide to give us.
- (j) If you access or use our Services through a third-party platform or service, or click on any third-party links, the collection, use, and sharing of your data will also be subject to the privacy policies and other agreements of that third party.
- (k) We may invite you to complete a survey or participate in a promotion, either through the Services or a third-party platform. If you participate, we will collect and store the data you provide as part of participation, such as your name, email address, or phone number. That data is subject to this Privacy Policy unless otherwise stated in the official rules of the promotion or in another privacy policy. The data collected will be used to administer the promotion or survey, including for notifying winners and distributing rewards. Where we use a third-party platform to administer a survey or promotion, the third party's privacy policy will apply.
- (l) If you contact us for support or to report a problem or concern (regardless of whether you have created an account), we collect and store your contact information, messages, and other data about you like your name, email address, location, operating system, IP address, and any other data you provide or that we collect through automated means. We use this data to respond to you and research your question or concern, in accordance with this Privacy Policy.

2.2 Data We Collect through Automated Means

- (a) When you access the Services (including browsing courses), we collect certain data by automated means, including:
 - (i) System data: Technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, browser, browser language, domain, and other systems data, and platform types;
 - (ii) Usage data: Usage statistics about your interactions with the Services, including programs and courses accessed, time spent on pages or the Service, pages visited, features used, click data, date and time, and other data regarding your use of the Services;
 - (iii) Approximate geographic data: An approximate geographic location, including information like country, city, and geographic coordinates.
- (b) The data listed above is collected through the use of server log files and tracking technologies, as detailed in the "Cookies and Data Collection Tools" section below. It is stored by us and associated with your account.

3. How We Get Data About You

We use tools like cookies, web beacons, analytics services, and advertising providers to gather the data listed above. Some of these tools offer you the ability to opt out of data collection.

3.1 Cookies and Data Collection Tools

- (a) Our service providers acting on our behalf (like Google Analytics and third party advertisers) and us, use server log files and automated data collection tools like cookies, tags, scripts, customised links, device or browser fingerprints, and web beacons (“**Data Collection Tools**”) when you access and use the Services. These Data Collection Tools automatically track and collect certain System Data and Usage Data (as detailed in Section 2) when you use the Services. In some cases, we tie data gathered through those Data Collection Tools to other data that we collect as described in this Privacy Policy.
- (b) We use cookies (small files that websites send to your device to uniquely identify your browser or device or to store data in your browser) for things like analysing your use of the Services, personalising your experience, making it easier to log into the Services, and recognising you when you return. We use web beacons (small objects that allow us to measure the actions of visitors and users using the Services) for things like identifying whether a page was visited, identifying whether an email was opened, and advertising more efficiently by excluding current users from certain promotional messages or identifying the source of a new page visit.
- (c) We store the following information:
 - (i) **Preferences:** To remember your preferred settings, such as language or appearance, to provide a personalized experience.
 - (ii) **Functional Settings:** To store app-related preferences that improve functionality.
 - (iii) **Session State:** cookies that track your interactions with the Services to help us improve the Services and your browsing experience, remember your login details, and enable processing of your course purchases. These are strictly necessary for the Services to work properly, so if you disable them then certain functionalities will break or be unavailable.
- (d) You can set your web browser to alert you about attempts to place cookies on your computer, limit the types of cookies you allow, or refuse cookies altogether. If you do, you may not be able to use some or all features of the Services, and your experience may be different or less functional.
- (e) Some of the third-party partners who provide certain features on our site may also use local storage objects (also known as Flash Cookies or LSOs) to collect and store data.

3.2 Online Advertising

- (a) We use third-party advertising services like Facebook, Google’s ad services, and other ad networks and ad servers to deliver advertising about our Services on other websites and applications you use. The ads may be based on things we know about you, like your Usage Data and System Data (as detailed in Section 2), and things that these ad service providers

know about you based on their tracking data. The ads can be based on your recent activity or activity over time and across other sites and services and may be tailored to your interests.

- (b) Depending on the types of advertising services we use, they may place cookies or other tracking technologies on your computer, phone, or other devices to collect data about your use of our Services and may access those tracking technologies in order to serve these tailored advertisements to you. To help deliver tailored advertising, we may provide the service providers with your email address and content that you share publicly on the Services.

4. What We Use Your Data For, and How Long We Store it

4.1 How we use your data:

- (a) We use your data to do things like provide our Services, communicate with you, troubleshoot issues, secure against fraud and abuse, improve and update our Services, analyse how people use our Services, serve personalised advertising, and as required by law or necessary for safety and integrity.
- (b) We use the data we collect through your use of the Services to:
 - (i) Provide and administer the Services, including to display customised content and facilitate communication with other users;
 - (ii) Process your requests for programs, plans, specific services, information, or features;
 - (iii) Communicate with you about your account by:
 - (A) Responding to your questions and concerns;
 - (B) Sending you administrative messages and information, including messages from health coaches, yoga instructors or ayurvedic consultants, notifications about changes to our Service, and updates to our agreements;
 - (C) Sending you information and in-app messages about our services;
 - (D) Sending push notifications to your wireless device to provide updates and other relevant messages (which you can manage from the “options” or “settings” page of the mobile app).
 - (iv) Manage your account preferences;
 - (v) Facilitate the Services’ technical functioning, including troubleshooting and resolving issues, securing the Services, and preventing fraud and abuse;
 - (vi) Solicit feedback from users;
 - (vii) Market and administer surveys and promotions administered or sponsored by us;
 - (viii) Learn more about you by linking your data with additional data through third-party data providers or analysing the data with the help of analytics service providers;
 - (ix) Identify unique users across devices;
 - (x) Tailor advertisements across devices;
 - (xi) Improve our Services and develop new products, services, and features;
 - (xii) Analyse trends and traffic, track purchases, and track usage data;
 - (xiii) Advertise the Services on third-party websites and applications;
 - (xiv) As required or permitted by law; or
 - (xv) As we, in our sole discretion, otherwise determine to be necessary to ensure the safety or integrity of our users, employees, third parties, the public, or our Services.

4.2 Criterion For Determining Data Retention Period:

It is not possible for us to determine a specific period for which we may retain your data. However, we will retain your data for longer than necessary, taking into account the following:

- (a) The purpose(s) and use of your data, both now and in the future (such as whether it is necessary to continue to store that information in furtherance of our obligations under a contract with you, or to contact you in the future);
- (b) Whether we have any legal obligation to continue processing your data (such as any record-keeping obligations imposed by any applicable law);
- (c) Whether we have any further legal basis to continue processing your information (including your consent);
- (d) Whether there is any relevant agreed industry practice on how long such data should be retained;
- (e) The levels of risk and liability involved for us to continue holding the data;
- (f) The amount of difficulty we may face to ensure the data can be kept updated and accurate; and
- (g) Any other circumstances (such as the nature and status of our relationship with you).

5. Who We Share Your Data With

5.1 We share certain data about you with our business partners, analytics and data enrichment providers, your social media providers, companies helping us run promotions and surveys, and advertising companies who help us promote our Services. We may also share your data as needed for security, legal compliance, or as part of a corporate restructuring. Lastly, we can share data in other ways if it is aggregated or de-identified or if we get your consent.

5.2 We may share your data with third parties under the following circumstances or as otherwise described in this Privacy Policy:

- (a) **With service providers, contractors, and agents:** We share your data with third-party companies who perform services on our behalf, like payment processing, data analysis, marketing, and advertising services (including retargeted advertising), email and hosting services, and customer services and support. These service providers may access your personal data and are required to use it solely as we direct, to provide our requested service.
- (b) **With business partners:** We have agreements with other websites and platforms to distribute our Services and drive traffic to us.
- (c) **With analytics and data enrichment services:** As part of our use of third-party analytics tools like Google Analytics and data enrichment services, we share certain contact information, Account Data, System Data, Usage Data (as detailed in Section 2), or de-identified data as needed. De-identified data means data where we've removed things like your name and email address and replaced it with a token ID. This allows these providers to provide analytics services or match your data with publicly available database information (including contact and

social information from other sources). We do this to communicate with you in a more effective and customised manner.

- (d) **To power social media features:** The social media features in the Services (like the Facebook/Instagram Share) may allow the third-party social media provider to collect things like your IP address and which page of the Services you're visiting, and to set a cookie to enable the feature. Your interactions with these features are governed by the third-party company's privacy policy.
- (e) **To administer promotions and surveys:** We may share your data as necessary to administer, market, or sponsor promotions and surveys you choose to participate in, as required by applicable law (like to provide a winners list or make required filings), or in accordance with the rules of the promotion or survey.
- (f) **For advertising:** If we decide to offer advertising in the future, we may use and share certain System Data and Usage Data with third-party advertisers and networks to show general demographic and preference information among our users. We may also allow advertisers to collect System Data through Data Collection Tools (as detailed in Section 3.1), and to use this data to offer you targeted ad delivery to personalise your user experience (through behavioural advertising) and undertake web analytics. Advertisers may also share with us the data they collect about you. To learn more or opt out from participating ad networks' behavioural advertising, see Section 7.1 (*Your Choices About the Use of Your Data*) below. Note that if you opt out, you'll continue to be served generic ads.
- (g) **For security and legal compliance:** We may disclose your data to third parties if we (in our sole discretion) have a good faith belief that the disclosure is:
 - (i) Permitted or required by law;
 - (ii) Requested as part of a judicial, governmental, or legal inquiry, order, or proceeding;
 - (iii) Reasonably necessary as part of a valid subpoena, warrant, or other legally-valid request;
 - (iv) Reasonably necessary to enforce our Terms of Use, Privacy Policy, and other legal agreements;
 - (v) Required to detect, prevent, or address fraud, abuse, misuse, potential violations of law (or rule or regulation), or security or technical issues; or
 - (vi) Reasonably necessary in our discretion to protect against imminent harm to our rights, property, or safety, or that of our users, employees, members of the public, or our Services.
 - (vii) We may also disclose data about you to our auditors and legal advisors in order to assess our disclosure obligations and rights under this Privacy Policy.
- (h) **During a Change in Control:** If we undergo a business transaction like a merger, acquisition, corporate divestiture, or dissolution (including bankruptcy), or a sale of all or some of its assets, we may share, disclose, or transfer all of your data to the successor organisation during such transition or in contemplation of a transition (including during due diligence).
- (i) **After Aggregation/De-identification:** We can disclose or use aggregate or de-identified data for any purpose.
- (j) **With Your Permission:** With your consent, we may share data to third parties outside the scope of this Privacy Policy.

6. Security

- 6.1 We use appropriate security based on the type and sensitivity of data being stored. As with any internet-enabled system, there is always a risk of unauthorised access, so it's important to protect your password and to contact us if you suspect any unauthorised access to your account.
- 6.2 We take appropriate security measures such as using HTTPS to transfer your data to protect against unauthorised access, alteration, disclosure, or destruction of your personal data that we collect and store. These measures vary based on the type and sensitivity of the data. Unfortunately, however, no system can be 100% secured, so we cannot guarantee that communications between you and us, the Services, or any information provided to us in connection with the data we collect through the Services will be free from unauthorised access by third parties. Your password is an important part of our security system, and it is your responsibility to protect it. You should not share your password with any third party, and if you believe your password or account has been compromised, you should change it immediately.

7. Your Rights

You have certain rights around the use of your data, including the ability to opt out of promotional emails, cookies, and collection of your data by certain analytics providers. You can update or terminate your account from within our Services, and can also contact us for individual rights requests about your personal data such as to restrict our processing of your data, to erase all data we have stored about you, and the right to ask for the data to be provided to you/porting to any other service in a commonly used machine readable format.

7.1 Your Choices About the Use of Your Data:

- (a) You can choose not to provide certain data to us, but you may not be able to use certain features of the Services
 - (i) To stop receiving promotional communications from us, you can opt out by using the unsubscribe mechanism in the promotional communication you receive or by changing the email preferences in your account. Note that regardless of your email preference settings, we will send you transactional and relationship messages regarding the Services, including administrative confirmations, order confirmations, important updates about the Services, and notices about our policies.
 - (ii) The browser or device you use may allow you to control cookies and other types of local data storage. Your wireless device may also allow you to control whether location or other data is collected and shared.

If you have any questions about your data, our use of it, or your rights, contact us at [●].

7.2 Accessing, Updating and Correcting, Porting and Deleting Your Personal Data:

- (a) You can access and update your personal data that we collect and maintain as follows:

- (i) To update data you provide directly, log into your account and update your account at any time.
- (ii) To terminate your account:
 - (A) Write to admin@saadhana.org to delete your account permanently.
 - (B) Please note even after your account is terminated, some or all of your data may still be visible to others, including without limitation any data that has been (a) copied, stored, or disseminated by other users; (b) shared or disseminated by you or others (including in your shared content); or (c) posted to a third-party platform. Even after your account is terminated, we retain your data for as long as we have a legitimate purpose to do so (and in accordance with applicable law), including to assist with legal obligations, resolve disputes, and enforce our agreements. We may retain and disclose such data pursuant to this Privacy Policy after your account has been terminated.
- (iii) To request to access, correct, port, or delete your personal data, or to restrict processing of your personal data, please email admin@saadhana.org . Please allow up to 30 days for a response. For your protection, we may require that the request be sent through the email address associated with your account, and we may need to verify your identity before implementing your request. Please note that we post deletion, we may retain certain data where we have a lawful basis to do so, including for mandatory record-keeping and to complete transactions.

7.3 Revocation of Consent:

We recognise that the processing of your data may be based on your consent. In case you wish to withdraw such consent given to us for the processing of your data, please e-mail us at admin@saadhana.org. Please allow up to 30 days for a response. For your protection, we may require that the request be sent through the email address associated with your account and may need to verify your identity before implementing your request. Further, please note that such revocation of consent shall be prospective in nature and shall not affect the lawfulness of any data processed based on your consent given prior to revocation.

7.4 Complaints about our privacy policy or use of your data:

While we take all measures to protect and secure your data, we understand that you may have grievances about our use of your data, or of our data protection measures. Please feel free to reach out to us at admin@saadhana.org with any such complaints.

In case you are not satisfied with our response, you can also reach out to the national data protection authorities in your region (provided you are in the EU).

Please note that while we urge you to write to us for any grievances or with any complaints you may have, this does not preclude you from directly approaching the national data protection authorities mentioned above.

8. Updates and Contact Information

When we make a material change to this Privacy Policy, we will notify you via email, in-service notice, or another mechanism required by law. Changes become effective the day they are posted. Please contact us via email with any questions, concerns, or disputes.

8.1 Modifications to This Privacy Policy:

From time to time, we may update this Privacy Policy. If we make any material change to it, we will notify you via email, through a notification posted on the Services, or as required by applicable law. We will also include a summary of the key changes. Unless stated otherwise, modifications will become effective on the day they are posted.

As permitted by applicable law, if you continue to use the Services after the effective date of any change, then your access and/or use will be deemed an acceptance of (and agreement to follow and be bound by) the revised Privacy Policy. The revised Privacy Policy supersedes all previous privacy policies.

8.2 Interpretation:

Any capitalised terms not defined in this policy are defined as specified in our Terms of Use.

8.3 Questions:

If you have any questions, concerns, or disputes regarding our Privacy Policy, please feel free to contact our privacy team (including our designated Data Protection Officer) at admin@saadhana.org.

The name and contact details of our data protection officer is as provided below:

Name: K V K Shreyas

Designation: Data Protection Officer

Email: admin@saadhana.org

Phone Number: 7989028632

Our Data Protection Officer may be contacted with respect to any complaints or concerns including those pertaining to breach of our Terms of Use and/or Privacy Policy.

9. Cookie Policy

9.1 What are cookies?

Cookies are small text files stored by your browser as you browse the internet. They can be used to collect, store, and share data about your activities across websites, including on Saadhana. Cookies also allow us to remember things about your visits to Saadhana, like your account ID, and to make the site easier to use.

We use both session cookies, which expire after a short time or when you close your browser, and persistent cookies, which remain stored in your browser for a set period of time. We use session cookies to identify you during a single browsing session, like when you log into Saadhana. We use persistent cookies where we need to identify you over a longer period, like when you request that we keep you signed in.

9.2 Why do we use cookies and similar technologies?

We use cookies and similar technologies like web beacons, pixel tags, or local shared objects (“**Flash Cookies**”), to deliver, measure, and improve our services in various ways. We use these cookies both when you visit our site and services through a browser and through our mobile app. As we adopt additional technologies, we may also gather additional data through other methods.

We use cookies for the following purposes:

To identify a user's device upon visiting the website, monitor a user's activity throughout the site, and facilitate any e-commerce features. Additionally, to enhance the website's user experience and analyse its usage patterns.

9.3 What are my privacy options?

You have a number of options to control or limit how we and our partners use cookies:

- (a) Most browsers automatically accept cookies, but you can change your browser settings to decline cookies by consulting your browser's support articles. If you decide to decline cookies, please note that you may not be able to sign in, customise, or use some interactive features in the Services.
- (b) Flash Cookies operate differently than browser cookies, so your browser's cookie-management tools may not remove them.

This Privacy Policy was last updated on 17th January,2025.