

# PRIVACY POLICY

## Cadopilar Software Private Limited

Cadopilar Software Private Limited (“**Company**”, “**we**”, “**us**”, or “**our**”) is committed to protecting the privacy, confidentiality, and security of personal data entrusted to us. This Privacy Policy describes how we collect, use, disclose, store, and protect personal data in a transparent and lawful manner.

This Privacy Policy is framed in accordance with applicable Indian laws and globally recognized data protection principles, including but not limited to:

- Digital Personal Data Protection Act, 2023 (India)
- Information Technology Act, 2000 and related rules
- General Data Protection Regulation (EU) – principles of lawfulness, fairness, and transparency
- OECD Privacy Guidelines and international best practices

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## Article 1. Scope and Purpose

This Privacy Policy applies to all users, customers, partners, and visitors who access or use the Company’s websites, applications, software products, platforms, and related services (“**Services**”).

The purpose of this Policy is to:

- Inform users about the personal data we collect
- Explain how and why such data is processed
- Outline user rights and choices
- Describe safeguards implemented to protect personal data

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## Article 2. Principles of Personal Data Processing

The Company processes personal data in accordance with the following global principles:

- **Lawfulness and Fairness:** Data is processed only where permitted by law
- **Transparency:** Users are informed of how their data is used
- **Purpose Limitation:** Data is collected for specified and legitimate purposes
- **Data Minimization:** Only data necessary for the stated purpose is collected
- **Accuracy:** Reasonable steps are taken to keep data accurate and up to date
- **Storage Limitation:** Data is retained only as long as required
- **Security and Confidentiality:** Appropriate safeguards are applied
- **Accountability:** The Company remains responsible for compliance

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## **Article 3. Purposes of Collection and Use of Personal Data**

The Company collects and processes personal data only for legitimate business and legal purposes, including:

### **3.1 Service Delivery and Contract Performance**

- Provision of software, licenses, subscriptions, and related services
- Account creation, authentication, and management
- Processing purchases, payments, invoicing, and renewals
- Customer support, training, and service communications

### **3.2 User Management and Security**

- Identity verification and fraud prevention
- Monitoring unauthorized or improper use
- Managing user access, restrictions, and disputes
- Responding to inquiries, complaints, and grievances

### **3.3 Business Operations, Analytics, and Improvement**

- Improving product functionality and user experience
- Usage analysis, diagnostics, and statistical research
- Internal audits, compliance, and risk management

### **3.4 Marketing and Communications**

- Sending product updates, newsletters, events, and promotional content
- Conducting surveys and feedback analysis

Marketing communications are sent only where permitted by law or based on user consent, and users may opt out at any time.

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## **Article 4. Categories of Personal Data Collected**

### **4.1 Data Provided Directly by Users**

- Name, email address, contact number
- Company name, designation, industry category
- Account credentials and preferences

### **4.2 Social Login Data (if applicable)**

- Name, email address, profile image, nickname

- Other information permitted by the social platform and user settings

#### **4.3 Service Usage and Support Data**

- Communication records
- Support tickets, quotations, training or partner application details

#### **4.4 Automatically Collected Data**

- IP address and device information
- Date, time, and duration of access
- Log files and usage records
- Security and fraud-prevention logs

#### **4.5 Payment and Transaction Data**

- Transaction identifiers and payment status
- Masked card or banking information processed via authorized gateways

**Note:** The Company does not store full card details and relies on PCI-DSS-compliant payment service providers.

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### **Article 5. Legal Basis for Processing**

Personal data is processed based on one or more of the following legal grounds:

- User consent
- Performance of a contract
- Compliance with legal obligations
- Legitimate business interests, balanced against user rights
- Protection of vital interests or prevention of fraud

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### **Article 6. Disclosure and Sharing of Personal Data**

The Company does not sell personal data.

Personal data may be disclosed only where necessary and lawful, including to:

- Authorized service providers and vendors (IT, hosting, payment processing, analytics)
- Professional advisers (legal, accounting, compliance)
- Government authorities or regulators where legally required

All third parties are bound by contractual obligations to maintain confidentiality, security, and lawful processing.

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## Article 7. Cross-Border Data Transfers

Where personal data is transferred outside India, the Company ensures that:

- Transfers comply with applicable data protection laws
- Adequate safeguards, contractual protections, or lawful mechanisms are in place

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## Article 8. Retention of Personal Data

Personal data is retained only for as long as necessary for the stated purposes or to comply with legal obligations.

Indicative retention periods include:

- Security and access logs: up to 180 days or as required by law
- Customer communications and grievances: up to 3 years
- Contracts, subscriptions, and billing records: up to 5 years
- Financial and transaction records: up to 5 years or longer if required

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## Article 9. Data Deletion and Destruction

When personal data is no longer required:

- Electronic data is securely erased or anonymized
- Physical records are shredded or securely destroyed

Deletion is carried out in accordance with internal policies and applicable law.

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## Article 10. User Rights (Data Principal / Data Subject Rights)

Subject to applicable law, users have the right to:

- Access personal data held about them
- Request correction or updating of inaccurate data
- Withdraw consent, where processing is consent-based
- Request deletion, subject to legal obligations
- Object to certain processing activities
- Seek grievance redressal

Requests may be submitted using the contact details provided below.

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## Article 11. Security Safeguards

The Company implements reasonable and industry-standard safeguards, including:

- Access controls and authentication mechanisms
- Encryption and secure storage
- Periodic security reviews and audits
- Employee confidentiality and data protection training

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## Article 12. Grievance Redressal and Contact Information

The Company has appointed a designated contact for data protection and grievance handling.

### **Grievance Officer / Data Protection Contact**

Cadopilar Software Private Limited

Email: support@cadopilar.com

Grievances shall be acknowledged and resolved within the timelines prescribed under applicable law.

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## Article 13. Amendments to this Privacy Policy

The Company reserves the right to update this Privacy Policy from time to time to reflect any changes in law, regulation, or operational requirements.

Material changes will be notified through appropriate channels. Where required, renewed consent shall be obtained.

- **Date of Announcement:** July 26, 2025
- **Effective Date:** July 26, 2025