Denave allows you to access your personal information, edit or obtain data collected about you. Just click this link (<u>Contact Us | Denave</u>) and fill in your request.

## 1. General

This Privacy Policy outlines Denave and its Affiliates' ("Denave", "we" or "us") practices with respect to collecting, using, and processing information when providing our online services (collectively, the "Services"). This is separate to our Terms of Service, which sets out more information about the Services ("Terms" or "Agreement").

Please read this Privacy Policy carefully so that you understand your rights in relation to your personal data and how we collect, use, and process your personal data. If you do not agree with this Privacy Policy or any part of it, you should not access this website or use our Services. Where personal data is about you is collected and processed by us in the Denave B2B Database (as defined below), you may opt-out by sending mail at <a href="mailto:privacy@denave.com">privacy@denave.com</a>.

The Denave is Sales Enabled Company and into Management Consulting Services, Sales and Marketing Services, Demand Generation Management, Manpower, Recruitment, and Staffing Services, Retail Solutions, Sales Training, in or outside India.

The information in the Denave B2B Database is retrieved from public sources, or from the contribution of relevant data from other users and business partners, rather than collected directly from data subjects. We license this data to authorized users for their lawful purposes. We implement processes to cross-check and verify the accuracy of the data in the Denave B2B Database.

# 2. What types of information do we collect from or about you?

## 2.1 We collect and process three main types of information:

## a) Information in Denave B2B Database ("Contact Data" and "Business Profiles").

We collect individuals' business information (each individual a "Contact"), like business information which can be found on a business card, including Full name, company name, job title, business phone number, and email address.

Once we have collected business information about a person or company, we combine multiple mentions of the same person or company into a Business Profile. Depending on the information we have, Denave either performs an ad-hoc search of our users in our unstructured database or provides a Business Profile found in our contact DB. These Business Profiles enhance, optimize, and enrich the Denave B2B Database and keep it up to date, allowing us to provide our Services.

#### b) Information registered with us ("User Data").

Individuals may provide information by contacting us via our website, support channels, creating an account, or using our Services. This information includes user activity, location, name, email address, phone number, mailing address, and any other information you provide us voluntarily e.g., via communications to us, additional information you publish about yourself and if you use Denave 's referral service, your referred friend's email address and name. Denave does not collect or process your payment information directly; payment processing is done by trusted third-party service providers.

#### c) Technical usage information from website visitors.

When you visit our website and use our Services, we automatically collect information sent to us by your computer, cell phone, or other access devices. This information includes: (i) device information (e.g., the type of browser and operating system your device uses, language preference, domain name, access time); (ii) mobile network information; (iii) your IP address; and (iv) alerts for troubleshooting errors and bugs. Where you are not logged into your account, this information is unidentified to you, and we are not aware of the identity of the user from which this information is collected.

## 2.2 Denave Integrations

As part of the services, Denave may make available to its users certain "Integrations". In using Denave 's Integrations, Contact Data from Users' CRM, email, Plug-in or other software may be transmitted to Denave to match or cleanse a customer's data against Denave 's B2B database. In this event, Denave may use such Contact Data to identify potential contacts to supplement the service and retrieve such data from other sources, verifying the accuracy of Business Profiles, removing out-of-date Business Profiles from the Services, or otherwise improving Denave 's research processes and the content provided by its services.

# 3. How do we process and use your information?

#### How do we process and use User Data?

We collect and process User Data to perform our contract, such as:

- To provide our Services, products, content, and functionality.
- To communicate with you regarding your purchase, inquiries, support request, feedback, or questions.
- To process and fulfill your order, including sending you any necessary emails related to your purchase of the paid services.
- To register, maintain and manage your user account or membership with us.
- To administer and provide services and customer support per your request.

We obtain your consent to process User Data for the following reasons:

- To sign you up for our newsletters or alerts.
- To verify the user's registration to the services and approve the user's email address; personalize our services for you; and
- If you opted into marketing, to communicate with users about our latest updates, upgrades, and products.

To be responsive to you and maintain our business relationship, as a matter of our legitimate interests, we will use your User Data to:

- Send you announcements in relation to security, privacy, or administrative related communications (these communications are not marketing orientated, and we do not rely on consent so you may not opt-out).
- Personalize our Services to ensure content from our Services is presented in the most effective manner for you and your device.
- Administer our Services, and for internal operations, to conduct troubleshooting, data analysis, testing, research, statistical and survey analysis.
- Comply with legal obligations or to enforce any applicable terms of service and to protect or defend the Services, our rights, the rights of our users, or others.

How do we process and use information in Business Profiles?

To provide the users of our services with access to Business Profiles, as a matter of our legitimate interests to run a successful and efficient business, we will use Business Profile information to:

- Enable our users, Community members, trusted vendors, and business partners to access the Business Profiles retained in the Denave B2B Database (e.g., through API) for the purpose of providing our service.
- Enrich, update, cross-check and validate the Denave B2B Database with current and up to date Business Profiles.
- Respond to Contacts' inquiries, support request, feedback, or questions.
- Detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the Services.
- Investigate violations and enforce our policies, and as required by law, regulation, or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request.

# 4. How we share your information?

We may share information with third parties in the ways and for the purposes described above.

In certain circumstances, we may also share and disclose such your information, if we believe in good faith that such disclosure is necessary or required: (i) to comply with a law, regulation, governmental or securities exchange requirement, court order, judicial proceeding, or legal process, such as a subpoena or a search warrant; (ii) to address a violation of the law; (iii) to investigate fraud or criminal activity, and to protect our rights or those of our affiliates, vendors and users, or as part of legal proceedings affecting or may affect us or our affiliates, vendors or users; and (iv) to allow Denave to exercise its legal rights or respond to a legal claim.

We may also share information in the following ways, and for additional purposes, as follows:

- With our users (Business Profiles only). We share Business Profiles that are related to Contacts with our users, trusted vendors, and business partners. Specifically, we may disclose to them (or permit their access to) Business Profiles retained in the Denave B2B Database for the purposes of ensuring that their prospective or existing Business Profiles are authentic, current, and up to date. At any time, you may decide to opt-out from enabling us to disclose or allow access to your Business Profile information stored on the Denave B2B Database by filling in your relevant details here.
- With our subsidiaries and affiliates. We may share your information with companies within our corporate family.
- With service providers and vendors for business purposes. Such third parties include (i) hosting services; (ii) data analytics vendors; (iii) payment processors; (iv) security vendors; and (iv) website hosting vendors.
- With professional advisors. As necessary, we may share your information with professional advisors functioning as service providers such as auditors, law firms, or accounting firms.
- In connection with an asset sale, merger, bankruptcy, or other business transaction. We
  may share your personal information while negotiating or in relation to a change of
  corporate control such as a restructuring, merger, or sale of our assets.

## 5. Retention

Customer Data will be retained by Denave strictly on our customer's behalf, in accordance with their reasonable instructions and as further stipulated in our Data Processing Addendum and other commercial agreements with such customers.

User Data will be retained by Denave for as long as it is reasonably necessary in order to maintain and expand our relationship and provide you with our Services and offerings; in order to comply with our legal and contractual obligations; or to protect ourselves from any potential disputes (i.e. as required by laws applicable to log-keeping, record and bookkeeping, and to have proof

and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), all in accordance with our data retention policy.

Business Profiles will be retained by Denave for as long as necessary to provide our Services, and as necessary to comply with our legal obligations, resolve disputes and enforce our policies.

If you wish to remove Business Profiles existing in our servers or if you prefer that we not share your Business Profiles with our users, vendors, or business partners, you may opt-out by sending mail. In this case, we shall not continue to process your Business Profiles. We maintain a suppression list to ensure that opt-out requests are respected and that such individual Business Profiles are not published in or added to the Denave B2B Database in the future.

Retention periods will be determined considering the type of information that is collected and the purpose for which it was collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

# 6. How do we safeguard and transfer your information?

We will take all steps reasonably necessary to ensure your information is treated securely and in accordance with this Privacy Policy. Although we take these steps to protect your information, we recommend that you do not use unsecured channels to communicate sensitive or confidential information to us. Once we receive your information, we take all appropriate technical and organizational measures, reasonable precautions, and follow industry best practices to safeguard your information against loss, theft, unauthorized use, access, or modification.

We are headquartered in the India and, while data is stored into secure environment. Many of our data processing activities are carried out from other countries so your information may also be processed by staff operating outside the European Economic Area who work for us or for one of our service providers or partners. We ensure that our transfer of data is following applicable laws ("Binding Corporate Rule" and "SCOC" signed between Denave UK, Poland and India).

For all entity and contact level information that we process or profile for any country, Denave follows strict guidelines, so as to comply with the relevant data protection, data privacy and data security laws and regulations of the respective country as applicable, included but not limited to GDPR (EU); CCPA (CA, US); privacy Directive (EU); Privacy Act 1988 and amendment, 2018 and Notifiable Data Breach Scheme, 2018 (AUS), Data Privacy Act 2012 (PHL), Personal Information Protection Act 2005, and amendment, 2015 (JPN), Personal Information Protection Act (KOR), Personal Data Protection Act, 2019 (THL), Privacy Act 1993, and amendment 2020 (NZL), Personal Data Protection Bill, 2019 (IND), and Personal Data Protection Act 2014 (SNG), and other consent and spam related regulations including but not limited to Telephone Consumer Protection Act (TCPA)/CAN-SPAM Act (USA), Telecom Commercial Communications Customer Preference Regulations, 2018 (IND), and ACMA-Spam Act, 2003 (AUS)

# 7. Cookies and other tracking technologies

A cookie is a small data file that is sent to your device when you first visit a website. Cookies usually include an identification number that is unique to the device you are using. Such identifiers can help us better understand our users and how they are using the Site and the Services.

Cookies also enable the recognition of a user when they re-visit the Site, keeping their settings and preferences and ability to offer customized features. If you prefer, however, at any time you can reset your browser, so it refuses all cookies or notifies you when a cookie is being sent.

• The Services may implement the following types of cookies: (i) cookies implemented by us for the purposes described above ("First Party Cookie"); and (ii) third-party cookies which are set by other online services who run content on the page you are viewing, for example by third party analytics companies who monitor and analyze our web access such as Google Analytics, <u>Facebook Analytics</u> that is used to track statistics and user demographics, interests, and behavior on websites and apps. We also use <u>Google Search Console</u> to help understand how our website visitors find our websites and to improve our search engine optimization.

You may remove the cookies by following the instructions of your device preferences; however, if you choose to disable cookies, some features of our Services may not operate properly, and your online experience may be limited. You may also configure your browser settings to use the Services without some cookie functionality. You can delete cookies manually or set your browser to automatically delete cookies on a predetermined schedule.

# 8. Minors

The products and services of Denave are not targeted to or intended for children under the age of 18. If you are under 18, you may not submit information about yourself to Denave. Denave reserves the right to modify or remove any information on the Site or Services at its own discretion.

If we become aware that a user is under the age of 18 has shared any information, we will discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us at <a href="mailto:privacy@denave.com">privacy@denave.com</a>.

# 9. Your rights

Denave allows you to access your personal information, edit or obtain data collected about you by contacting our Privacy Team at <a href="mailto:privacy@denave.com">privacy@denave.com</a>. For deletion and opting out from Denave B2B Database, you need to email to <a href="mailto:privacy@denave.com">privacy@denave.com</a>.

You may have other rights around your data, such as the right to receive a copy in a machine-readable format, the right to update or amend your data, the right to delete your data, the right to restrict how we use your data or object to our usage (including objecting to marketing) and/or the right to withdraw consent and the right to complain to your local data protection authority. Some of these apply only in certain circumstances. To exercise any of your rights, please email <a href="mailto:privacy@denave.com">privacy@denave.com</a>

## 10. Contact us

If you have any additional questions about our privacy practices, or if you feel your privacy was not treated in accordance with our Privacy Policy, please feel free to address us at <a href="mailto:privacy@denave.com">privacy@denave.com</a> or contact us at:

Denave India Pvt. Ltd.

No. 406A, Indraprastha Tower 6, Commercial Complex, Wazirpur, New Delhi, Delhi – 110 052

Denave Pte. Ltd

11 Collyer Quay, The Arcade, 17-14/19, Singapore 049317

**Denave Europe Limited** 

Orchard Business Park (Titan Storage Solutions), Forsyth Rd Woking GU21 5SB

\*"Affiliates", shall mean subsidiaries, parent companies, joint ventures, and other corporate entities under common ownership.