

PRIVACY POLICY

Effective Date/Date Last updated: 17 December 2024

At HyperVerge Technologies Private Limited & HyperVerge Inc. (“**HyperVerge**”, “**We**”, “**Our**”, or “**Us**”), We are committed to respect and protect the privacy of the users (“**You**”, “**Your**” or “**User**”). This Privacy Policy (“**Policy**”) explains how We process and treat Your data including Personal Data (defined below) when You visit www.hyperverge.co (“**Website**”) and explains the rights that are available to You.

SCOPE OF PRIVACY POLICY

This Privacy Policy applies solely to the information collected through your access and use of the Website. It does not apply to any information provided to us through the utilization of HyperVerge services. Separate terms and conditions may govern the use, and protection of data provided through the utilization of HyperVerge services which are in line with industry best practices.

If you are an individual who is a recipient of HyperVerge services through a HyperVerge’s client, this Policy does not apply to you. Please refer to the client’s privacy policy and [Privacy Policy-Processor](#) and [HyperVerge Facial Scan Policy](#).

WHAT IS PERSONAL DATA/INFORMATION?

Personal Data means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person (“**Personal Data/Personal Information**”).

DATA THAT WE COLLECT

The types of Personal Data that we may receive, collect, store and process fall into the following categories:

Personal Information/ Personal Data that You provide to Us voluntarily

While using Website, You may voluntarily provide Personal Data. For example: As part of demonstration that is available on the Website, You provide personal information limited to Your email ID and phone number. The Personal Information collected is used solely for the purpose of reaching out to You and providing the demonstration that You have signed up for.

Type of Information	Contents
Personal Details	Mobile Number and Email ID as voluntarily submitted by You while booking a request for demo.
IP Address	IP address to redirect to website hosted in Your country.

We do not collect any information about Your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about Your health, genetic, or any information about criminal convictions and offences.

Furthermore, Your access and utilisation of the Website does not involve or create a situation of interception or recording of oral or electronic communications of the User.

We display personal testimonials and/or reviews of satisfied customers on Our Website in addition to other endorsements. If You wish to update or delete Your testimonial, You can contact Us at privacy@hyperverge.co/ dpo@hyperverge.co.

Non-Personal Information That We Collect when You Access the Website

Log Files: We follow a standard procedure of using log files. Our website and applications use logs to see how many people visit them and what they do on the website. This information includes the person's IP address, what browser they were using, what ISP they were using, and when the visit occurred. These are not linked to any information that can identify an individual and therefore is treated as Non-Personal Information under this Policy. The purpose of this information is to help us analyze how people are using the website, and to see how users are moving around it.

Cookies: Cookies are small bits of data we store on the device you use to access our Website which includes non-personal usage data about You. This includes user preferences, such as your default language, in cookies to personalize the content you see and to improve our services. Other examples include usage trends of Our Website, to track referral data, as well as to occasionally display different versions of content to You.

You can also disable cookies to prevent Your browser from giving Us information, however, if You do, certain features of Our Website may not work properly.

HyperVerge uses analytics and tracking technology services provided by third parties. These services are used to collect information such as browser type, to track the number of visitors to the website and to get a general understanding of how Our visitors access the Website. Following is a list of data we receive from such third party service providers:

Serial No.	Type of Information	Contents
1.	Information on your Company (publically available)	Company Profile
2.	Browser and device data (anonymised)	Browser information, Device type, Device model, company IP address, Operating System
3.	Usage Data (anonymised)	Pageviews, Pages visited, Time spent on page, number of active Users

Following are the relevant third-party services we utilize for receiving the above information:

Third-Party Vendor	Function the Third-Party Service Performs
Factors.ai	End-to-end marketing analytics & website visitor tracking platform.
ZoomInfo	Business-to-Business (B2B) Database provider and user analytics tracking.
Apollo.io	Business-to-Business (B2B) Database provider and user analytics tracking.
Google Analytics	End-to-end marketing analytics
Microsoft Clarity	Website user behaviour recording & analysis
OneTrust	Cookie compliance
HubSpot	Marketing automation & form analytics

If You provide Personal Data to these other third parties, it would be governed by their privacy policies and terms of use. We are not responsible for the privacy and security practices of these other websites or services. We encourage you to learn about these other websites' privacy and security policies before providing them with your Personal Information.

YOUR CONSENT

By using or accessing Our Website and submitting your Personal Data to Us, You acknowledge that You accept and consent to this Privacy Policy. If You do not accept the terms of this Policy, You may either opt out or address any specific concerns regarding this Policy by writing to Us at privacy@hyperverge.co/ dpo@hyperverge.co.

NON-PERSONAL INFORMATION DATA STORAGE

Log files and Cookies gathered as mentioned above will only be kept for a maximum duration of 1 (one) year. The retention duration for third-party cookies is specified in their privacy policy, which can be accessed via the provided hyperlink in the table above.

PUPROSE OF COLLECTION

The collected information shall be used for the following purpose:

- Contact you for service/product related query in case You have submitted information as part of in-bound sales query.
- Contact you for advertising our services or sharing updates with You. We will only do this when information is provided by you voluntarily while accessing the Website. You may opt out at any time by contacting contact@hyperverge.co.
- Meeting legal and regulatory requirements. For example, to comply with a valid legal subpoena, request, or other lawful process that meets the regulatory requirements or that we otherwise determine is necessary to respond to.
- Establish, exercise or defend legal claims.
- Corporate reorganisation: In the event of a corporate sale, merger, reorganization, dissolution, acquisition or similar event, any personal information and other data We process from You may become part of the assets We transfer or share in preparation for any such transaction. Any acquirer or successor of HyperVerge shall continue to process personal information consistent with this Policy.

LEGAL BASIS OF PROCESSING

We rely on the following legal bases for processing Your Personal Data:

- **Consent:** Where we have express consent from You to process Your Personal Data.
- **Legitimate business interest.** This refers to the interest in conducting and managing Our business. We ensure to consider and balance any potential impact on You (both positive and negative) and Your rights before We process Your Personal Data for Our legitimate interests. You can find out more about how We assess Our legitimate interests in relation to the potential impact of certain activities by contacting Us.
- **To comply with a legal obligation.** This means processing Your Personal Data if it is necessary to fulfil a legal obligation imposed on Us or defending any claim against us relating to Your Personal Information. To comply with a valid legal subpoena, request, or other lawful process that meets the regulatory requirements or that we otherwise determine is necessary to respond to.

DISCLOSURE OF YOUR PERSONAL DATA

The Personal Information you provide to us may be hosted on servers located in the United States, operated by HubSpot, Inc., as well as on our own servers located in India. By providing your Personal Information, you consent to the transfer and hosting of such information on servers located in these jurisdictions. We disclose Personal Information shared by you to Hubspot for recording and managing details you have provided for HyperVerge's use. We require Hubspot to respect your privacy and keep your personal data safe, confidential and to only be used for specific purpose it was disclosed and in accordance with Our instructions. We ensure that Your Personal Information is not shared with any other third party.

Our third party service providers mentioned above, such as Hubspot, process your Personal Data in accordance with the laws that are applicable to them. The countries where Our third parties process Your information may not have similar data protection laws to India. Furthermore, the regulatory agencies and legal authorities' practices and the methods through which they access the data in those countries is significantly different from the practice that is followed in India. When information is transferred by Us, We shall ensure that your privacy rights continue to be protected by taking all the required steps which are consistent with our obligations under law and documented in this Policy.

For users located in EEA, United Kingdom, and Switzerland: We take measures to help protect your personal information when it is transferred from the EEA, United Kingdom, and Switzerland to third countries. Where applicable, we rely on standard clauses approved by the European Commission in our contracts with third parties that receive information from both inside and outside the EEA, or transfer on the basis of permissible statutory derogations.

In certain extraordinary situations, We may also share your Personal Data investigating authorities, regulators, courts or government authorities where required by law to comply with a court order, direction, notification or request in accordance with the applicable laws as amended from time to time.

NO SALE OF DATA

We do not sell Your personal information to any third parties and have not undertaken any such sale within the preceding 12 months.

SOCIAL MEDIA FEATURES

Our websites includes social media links and the Use of these features may allow those websites to collect your IP address, detect which page you are visiting on our site, and set a cookie to enable the feature to function properly. Your interactions with these features are governed by the privacy policy of those third party providing it.

YOUR LEGAL RIGHTS

The rights provided hereunder apply to You according to the data protection laws of the country which You are based on. In the situation You would like to access, rectify, erase, restrict or object to processing, or exporting Your Personal Data, We will extend Our sincere support to in responding to Your request within a reasonable timeframe.

If you make a request or would exercise any of the below mentioned rights, please contact us at privacy@hyperverge.co/ dpo@hyperverge.co

Depending on where You live, You may be entitled to the following rights:

- a) **Right of access:** You have the right to access and obtain a copy of Your Personal Data that We hold. You may also be informed about the information's source, period and purpose of processing, and the parties to whom the information is shared if requested by You.
- b) **Right to request deletion:** When it is no longer necessary for the purposes for which Your Personal Data was originally collected, You have the right to request that We delete Your Personal Data or in any other situation you deem fit, unless permitted by applicable law.

Note: You may also designate an authorized agent to submit a request on Your behalf to access or delete Your personal information. To do so, You must (1) provide that authorized agent written and signed permission to submit such request, and (2) verify You own identity directly with Us.

- c) **Right to lodge complaint with the regulator:** You have the right to complain to the appropriate supervisory authority if You have any grievance regarding the collection, use or sharing of Your Personal Data by Us.
- d) **Right to rectification:** You have the right to revise the information We hold about You or to remedy any inaccuracies. Based on the purpose for which We use Your information, You may intimate Us to either add additional information about You in Our database or correct any wrong information We may have about You on Our database.
- e) **Right to restrict processing:** You may also have the right to request to restrict the use of Your Personal Data in certain circumstances, such as when You have objected to Our use of Your Personal Data but We need to verify whether We have overriding legitimate grounds to use it.

Note: If You revoke Your consent, We will stop processing the personal data as soon as practicable but not later than 30 days after receiving the request.

- f) **Right to portability:** Some jurisdictions may provide you with the legal right to transfer Your Personal Data to a third party or Yourself in a structured, commonly used and

machine-readable format. We will transmit Your Personal Data to a third party service provider where technically feasible.

- g) **Right to object to processing:** You have the right to oppose to the use of Your Personal Data in certain circumstances, such as the use of Your Personal Data for a task carried out in the public interest; the exercise of official authority vested in you; direct marketing or your legitimate interests (or those of a third party).
- h) **Right in relation to automated decision making and profiling:** You have the right to not be subjected to any automated processing, including profiling which entirely influences a decision. **Please note that we do not undertake profiling based on Your Personal Data.**
- i) **Right to Non-Discrimination:** We will not discriminate against You for exercising Your rights.
- j) **Right to appeal:** If you are a resident of the United States, you may request an appeal of a refusal of a request regarding your privacy rights under the applicable state data protection laws by sending an email to dpo@hyperverge.co with the subject title of the email to contain “*Appeal*”.

OPTING OUT OF MARKETING

Users who have provided their information and registered on the Website have opted in to receive promotional emails and newsletters from time to time. Users can unsubscribe from mail threads in the following 2 ways:

- Reply to the mail thread sent by Us stating that You wish to unsubscribe.
- You may unsubscribe from Our newsletters by clicking on the 'unsubscribe' option that is available in the newsletter.
- Write to us at dpo@hyperverge.co

DATA INTEGRITY AND SECURITY

We are ISO 27001 certified and also have a SOC2 Type 1 certification with respect to Our information security practices and infrastructure. Furthermore, Our system is configured with data encryption, or scrambling technologies and firewalls constructed to the highest industry standards. We also use Secure Socket Layer (SSL) technology that protects the data you send over the internet.

We recommend that You use the latest available versions of browsers in order to take advantage of updates in security technology. Although We strive to protect Your information, no data transmission over the Internet is completely secure. There is some risk associated with any data transmission, including the risk that Personal Data may be intercepted in transit. Therefore, We

cannot guarantee its absolute security. However, We have put in place necessary procedures to deal with any suspected or possible breaches of Personal Data and will immediately notify You and any applicable regulatory authority of a breach where We are legally required to do so.

DATA RETENTION

We retain your data for as long as necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required by law. You may request the deletion of your data at any time, and we will promptly take appropriate measures to delete it from our records.

DISPOSAL

When the purpose of processing your personal data is accomplished, we ensure safe disposal of documents that contain Your personal identifying information i.e. paper or electronic documents no longer required are destroyed by shredding, erasing, or otherwise modifying the personal identifying information to make it unreadable or indecipherable through any means.

CHILDREN'S PRIVACY

Our website and services are not directed to children under the age of 18 or 16 (depending on the jurisdiction you are accessing this Policy from), and HyperVerge will never knowingly collect personal or other information from anyone it knows is under the age of 18 or 16. We recommend that persons under 18 years of age, ask their parents for permission before using our Website or services or sharing any information about themselves with Us.

To the extent we have actual knowledge that we collect or maintain personal information of a minor under age 16, those minors between the age of 13 and 16 must opt in to any sales of personal information (as defined under applicable law), and minors under the age of 13 must have a parent consent to sales of personal information (as defined under applicable law). All minors have the right to opt-out later at any time.

It is assumed that the Users who provide Personal Information are aged 18 and above unless accompanied by parental consent. We do not knowingly gather Personal Information from individuals under the age of 18. In the event that we become aware of an individual under 18 providing us with Personal Information, we will promptly take appropriate measures to remove it.

COMPLIANCE WITH THIS PRIVACY POLICY

We ensure that Personal Data You provide is used in conformity with this Policy and take up periodic reviews to ensure this. HyperVerge regularly verifies that the contents of this Policy are accurate, detailed, contemporary for the types of information and data intended to be covered and

is completely implemented and accessible bearing in mind the values enumerated in this Policy. If You have any grievances about Our conformity or adherence to this Policy or the manner in which Your Personal Data is used, kindly write to Us privacy@hyperverge.co/dpo@hyperverge.co. We shall contact You, and if necessary, cooperate and engage with the appropriate regulatory authorities to ensure that your grievances are addressed effectively.

CHANGES OR MODIFICATIONS

HyperVerge reserves the right to change this Policy at any time. We may modify this Policy to reflect changes in the way We collect, use, or disclose information, or to reflect changes in privacy laws, regulations, and/or industry standards. We encourage Users to review this Policy when accessing the Website. If we make a material change to this Policy, we will provide You with appropriate notice.

CONTACT INFORMATION AND DATA PROTECTION OFFICER

If you have any questions or concerns regarding our Privacy Policy, please send us a detailed email to privacy@hyperverge.co/dpo@hyperverge.co.

You can contact our Data Protection Officer at the address below referencing "Privacy Policy" through mail as well. The Data Protection Officer shall redress the grievances or provide information expeditiously but within one month from the date of receipt of the grievance:

Details of Data Protection Officer/Chief Privacy Officer:

Attention: Data Protection Officer

Address: HyperVerge Technologies Private Limited, No. 12, 2nd Floor, Urban Vault, 17th cross, Sector 7, HSR Layout, Bengaluru Karnataka – 560102