

## Privacy Policy

Interactive Avenue Private Limited is committed to protecting the privacy and security of your personal data. Your privacy is important to us. This privacy policy (“**Privacy Policy**”) explains how Interactive Avenue Private Limited located at 3<sup>rd</sup> Floor, V Chhibber House, Sakinaka Mumbai - 400 072 Maharashtra (“we” “us” “our”) will process your personal data when you visit our website (<https://www.enterprisebharat.com>) to participate in EnterPRISEBharat organised by Prudential Management and Services Private Limited.

Before participating in EnterPRISEBharat, you should read this Privacy Policy. By your participation in EnterPRISEBharat including submission of your personal data that is required for the same, you are explicitly consenting to the processing of your personal data as set forth in this Privacy Policy.

### 1. Which of your personal data we process

Website visitors: During your visit of the website, we will automatically collect the following information:

- The selected page on our website (URL)
- Date and the time of your visit of the website
- Your IP address
- Name and version of your web browser
- Certain cookies (see point 2 below)

Participants: We collect personal data from you directly (viz. your full name, date of birth, phone number, business address whether rented or owned, tweet link, business story, Aadhar card, GST returns, PAN card, IT returns, proof of ownership or lease agreement, social media handle including photos, videos, sound recordings regarding your business story), when you provide us with it, at different stages, when participating in EnterPRISEBharat.

For verification purposes, we will also collect personal data of people from the community, from you directly when you provide us with it, as your references which will include their name and phone number.

You are under no obligation to provide the personal data that we ask you for. However, if you do not provide your personal data, you will not be able to participate in EnterPRISEBharat.

We may use third-party service providers to assist us with various purposes under this initiative. Our service providers will receive your personal data on our behalf and will not be permitted to use it for any other purpose other than as specifically provided under this Privacy Policy.

Any personally identifiable information provided by you will not be considered as private and confidential if it is freely available and / or accessible in the public domain like any comments, messages, blogs, available on social media platforms like Facebook, Twitter, etc.

## **2. Cookies**

To improve your experience on the website, we collect, use and store cookies. A cookie is a small file that may be installed on your device when you visit a website and is used to identify the user or device and to collect information. Cookies are generally used to provide site visitors with additional functionality within the site. They may for example be created to keep track of your visit and support your navigation of the website, help you resume where you left off and/or remember your preferences and settings when you visit the website again. Cookies cannot access, read or modify any other data on your device.

Most of the cookies used on this website are so-called session cookies. They are automatically deleted once you leave the website. On the other hand, persistent cookies remain on your device until you delete them in your browser. We use persistent cookies to recognize you when you visit this website the next time.

If you want to control the cookies installed on your device, you can modify your browser settings so that it notifies you when a website wants to install a cookie, or you can block cookies altogether. You can also delete cookies that have already been installed on your device. Refer to the 'Help' function within your browser for more information on how to do these things. By showing how and when our visitors use this website, it can help us to improve our website on a continual basis.

Please note, however, that disabling cookies might affect your online experience and/or prevent you from taking full advantage of the website.

## **3. Purposes for which we process your data**

The use of your personal data is subject to the Privacy Policy in effect at the time of our use. We will process your personal data for the following purposes:

- to make this website available to you to submit your Entries to EnterPRISEBharat and to further optimize and develop this website;
- to verify your identity and to establish the legitimacy of your business by evaluating your application and related submissions like proof of identity and/or eligibility;
- to record and analyse your participation in EnterPRISEBharat;
- to conduct the necessary due diligence including but not limited to KYC checks on all the data including documents submitted by you at the relevant stages of EnterPRISEBharat which may include all claims made by you about your business and any background checks deemed necessary by the Organizers either by themselves or through third party service providers specifically engaged for the purpose of conducting necessary due diligence. This may include reviews of civil and criminal records, financial, credit, and employment history, or any other type of background checks deemed necessary by Organizers.
- to conduct video call verification, wherever required, to verify your identity;
- to create website usage statistics;
- to be able to recognize, prevent and investigate attacks of this website;
- to communicate with you;

- to record and publish a short video of your business story, in case it is shortlisted by the Organizers, in all forms of media without any restrictions whatsoever;
- to enforce our terms and conditions;
- to comply with legal obligations;
- to raise or defend against legal claims;
- to protect our participants, systems, and services; and
- as otherwise described to you at the time of collection of the personal data.

We endeavor to collect only such personal data that is reasonably necessary to perform the desired function.

#### **4. Legal basis of the processing**

We can only use your personal data if we have a legal basis for doing so. We process your personal data provided by you either (i) on the basis of your consent; or (ii) on the basis of the necessity to comply with legal obligations to which we are subject; or (iii) on the basis of the necessity for the performance of the contract we have concluded with you.

#### **5. Share / transfer of your personal data**

Your personal data will be reviewed by Mr. Anand Mahindra, the Organizers and third-party agencies that may be engaged by the Organizers. For the purposes set out above in point 3, you expressly consent to Mr. Anand Mahindra, the Organizers and third-party agencies which may be engaged by the Organizers reviewing your personal data, only when necessary, to evaluate your application and related submissions made for participating in EnterpRISEBharat and for conducting necessary due diligence.

As far as this is necessary for the purposes set out above in point 3, we will transfer your personal data to the following recipients:

- IT service providers;
- Organizers
- Third-party agencies to conduct due diligence on all the personal data including documents submitted by you at relevant stages of EnterpRISEBharat;
- Public authorities which include government agencies, law enforcement and other public authorities for the purpose of verification of identity or for the prevention, detection, investigation including cyber incidents, prosecution and punishment of offences.)

We only transfer your personal data to recipients that have an adequate level of data protection by implementing appropriate technical and organizational security measures, or we take measures to ensure that all recipients provide an adequate level of data protection as prescribed by applicable law.

#### **6. How long do we keep your personal data**

We will retain your personal data for as long as we reasonably consider it necessary for achieving the purposes as set out under point 3 above and as is permissible under applicable law. This is determined

on a case to case basis. We will, in any case, retain your personal data for as long as there are statutory retention obligations or potential legal claims are not yet time-barred.

## **7. Your rights in connection with your personal data**

We respect your right to access and control your personal data, and we will respond to requests for information and, where applicable, will correct or amend your personal data.

Your participation in EnterpRISEBharat is voluntary and you are free to withdraw your consent at any time by writing to us. In such cases, we will need you to respond with proof of your identity before you can exercise these rights. We may not be able to process any requests made in the event you fail to identify yourself or if we are unable to authenticate you as a participant of EnterpRISEBharat.

Please note that applicable law might require that we cannot comply with every request. We may be required to keep your personal data due to statutory retention requirements. We will not be responsible for the authenticity of the personal data provided by you.

Under applicable law, you have the rights (under the conditions set out in applicable law): (i) to review the information you had provided; (ii) to request the correction or amendment of your personal data that is found to be inaccurate or deficient; (iii) in certain circumstances to object, for legitimate reasons, to the processing of your personal data or to withdraw consent previously granted for the processing where such revocation does not affect the lawfulness of the processing until the revocation in which case you shall not be able to participate in EnterpRISEBharat for which consent to process the abovementioned personal data was sought; (iv) to address any discrepancies and grievances with respect to the processing of your personal data in a time bound manner by writing to the Grievance Officer.

## **8. Security Measures**

We are strongly committed to protecting your privacy and accordingly, we implement reasonable security practices and procedures in relation to the personal data and other information that is processed by us.

## **9. Changes to the Privacy Policy**

We may update this Privacy Policy from time to time without any notice. Any material changes to the Privacy Policy will be posted on this page. The updated Privacy Policy will take effect as soon as it has been updated. To make sure you are aware of any changes, please review this Privacy Policy periodically.

## **10. Our contact details**

If you have questions or comments regarding this Privacy Policy or want to express your grievances regarding the processing of your personal data, please contact the Grievance Officer by writing to him at the following address:

Mr. Romin Gavankar

The Grievance Officer  
Prudential Management and Services Private Limited  
Cecil Court, 5<sup>th</sup> floor,  
Mahakavi Bhushan Marg, Colaba,  
Mumbai 400 001, Maharashtra  
[privacy@enterprisebharat.com](mailto:privacy@enterprisebharat.com)

This Privacy Policy was last updated on 30<sup>th</sup> January 2023.