
PRIVACY POLICY

Effective from October 01, 2017

1. PURPOSE AND APPLICATION

This Privacy Policy ("Policy"), *as defined herein* explains how Stellapps Technologies Private Limited and its Subsidiaries (together referred to as "We" and/or "Us" and/or "Our" and/or "Company" and/or "Stellapps") collects, uses, stores, discloses or otherwise processes "**Information**" (*as defined in this Policy*) from its customers through its applications/equipment installed at customers' premises and from its users/customers ("User(s)" and/or "You" and/or "Your") accessing its website in the name and style of www.stellapps.com and www.moomark.in (the "Websites"). This Policy also describes the rights the customers and users have with respect to their Information.

We request You to read this Policy carefully before using the Websites or any of Our products and applications. If You do not agree with the terms of this Policy, do not use the Websites or avail any of the services offered by Us including usage or access of Our equipment/applications. By using the website/application/equipment, You signify Your acceptance to the terms of this Policy and agree to be legally bound by the same. Whenever You submit Information via the website or Our applications, You explicitly consent to the collection, use and disclosure of the Information in accordance with this Policy.

Stellapps does not provide services to children. If You are under the age of 18 years, you may visit the websites of Stellapps and use Our applications only under the guidance and responsibility of a parent or guardian who is above 18 years. In such cases, while we will not store the data of children, the data of parent/ guardian will be treated similar to as if the parent/ guardian is accessing our website/ application/ equipment.

We shall collect, use, distribute, process and store Your Information in accordance with the **Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.**

We shall protect the Information by using a reasonable degree of care, to prevent the unauthorized use, dissemination, or publication of such Information. We will not disclose the Information to any person without the relevant user's/customer's consent and limit dissemination of "**Confidential Business Information**" (*as defined in this Policy*) only to customer's employees or agents nominated by customer having a "need to know".

We respect and value Your privacy and shall strive towards protecting the Information that You provide. We shall keep the Information provided to Us as confidential and secure, as required under the applicable laws.

2. ABOUT STELLAPPS TECHNOLOGIES PRIVATE LIMITED AND ITS SUBSIDIARIES

Stellapps Technologies Private Limited and its Subsidiaries have their registered offices at Bengaluru, India. Stellapps is engaged in the business of providing end to end technology solutions, building automation tools integrated with cloud, mobility and data analytics for dairy farms, cooperatives, and private dairies. Stellapps also provides dairy farm optimization and monitoring services with special focus on small and medium herd size farm.

Stellapps offers a wide range of innovative applications, products and state-of-the-art mechanization tools which attend to the needs of our business customers such as automation of milk collections and payments etc. Stellapps's various products and applications are capable of supporting data arising out of tens of millions of litres of milk through the milk production, procurement and cold chain flow across millions of farmers.

Stellapps by virtue of its innovative products, applications and state-of-the-art technology focuses and aims to improve the Agri-supply chain parameters, including milk production, procurement, cold chain, herd management, animal insurance and farmer payments. It is also extending the farm improvement and farm extension services to the farmers, access to quality cattle nutrition products and also enabling the financial inclusion of the farmers in the finance ecosystem to directly make an impact on increasing the quality and production of the milk and in hand income of the farmers.

3. DEFINITIONS

- **Confidential Business Information** means the confidential information or data collected from our customers and dairy farmers through Our applications/equipment installed at their premises or mobile phones and which may include details including names and contact information of the dairy farmers; quantum of milk collected, banking information, details of livestock etc.

However, such Confidential Business Information does not include information which: (i) is or becomes a part of the public domain (ii) was in Our possession prior to Our arrangement with the relevant customer; or (iii) is obtained by Us in good faith from

a third party having the right to disclose such information without an obligation of confidentiality.

- **Cookies** means small text files that are downloaded on the computer while visiting a website. The Cookie helps the website recognize a device for their next visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.
- **Force Majeure Event** shall mean any event that is beyond Our reasonable control and shall include, without limitation, fire, flood, explosion, acts of God, civil commotion, strikes, insurrection, war, acts of government, pandemic, epidemic, embargo, computer hacking, software failure including unauthorized access by third parties, storage device and computer crashes etc.
- **Information** collectively refers to the Confidential Business Information, Personal Information and Sensitive Personal Information in this Policy which is collected from third parties (including customers, vendors, etc.) and through use of Stellapps Websites, applications, equipments, Cookies or other similar tools.
- **Personal Information** 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 Stellapps is capable of identifying such person. Examples include first name, last name, mobile number, email address, Ip address, etc.
- **Process or Processing** in relation to Information, means an operation or set of operations performed on Information, and may include operations such as collection, recording, organization, structuring, analysis, evaluation, segregation, storage, adaptation, alteration, retrieval, use, alignment or combination, indexing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.
- **Policy** refers to this Privacy Policy.
- **Sensitive Personal Information** of a person means such personal information which consists of information relating to; (i) password; (ii) financial information such as Bank account or credit card or debit card or other payment instrument details; (iii) physical, physiological and mental health condition; (iv) sexual orientation; (v) medical records and history; (vi) Biometric information; (vii) any detail relating to the above clauses as provided to Stellapps for providing service.

However, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information.

- **SmartMoo application suite** refers to the application used by Stellapps as mentioned in Clause 4 of this Policy.
- **Stellapps/Company** includes Stellapps Technologies Private Limited and its Subsidiaries.
- **Subsidiaries** shall mean Moomark Private Limited, Moopay Private Limited and any other entity which becomes subsidiary in future.
- **User/Customer** means the natural person to whom the Information relates.
- **Web Site** means www.stellapps.com and www.moomark.in respectively.

ANY CAPITALIZED WORDS USED HENCEFORTH SHALL HAVE THE MEANING ACCORDED TO THEM UNDER THIS POLICY.

4. COLLECTION OF INFORMATION

For the purposes of effective functioning of SmartMoo application suite, We may collect and store Confidential Business Information from You, which includes but shall not be limited to:

- Details of Your interactions with farmers, agents, animals, extension staff etc., including but not limited to their names and contact details;
- Details of the quantum of milk or other dairy products;
- Details of the livestock and infrastructure available; and
- Payment terms agreed

The Personal Information and Sensitive Personal Information You may provide to Us, includes and that We may use are as follows:

- Personal details, such as usernames provided by You for which We use reasonable security measures for password protection from anyone;
- Your usage of the Website and our products and applications;
- The details of the computer system, mobile phone, or computer network that You use to visit the Website or towards our products and applications or any activities undertaken through the usage of the Website;
- Your first, middle and last name, e-mail address, phone number, copy of PAN, Voter ID, etc.; and
- Sensitive Personal Information like a copy of Aadhar, password, bank account details, annual income, credit card or debit card details, etc.

We also collect and store an activity log unique to You that collects certain administrative and traffic information including without limitation source IP address, time of access, date of access, web page(s) visited, language use, Website and Our products and applications crash reports, type of browser used, the technical operation of the Website and Our products and applications, and any information required to ensure Your use of the Website and any of Our products and applications are compliant with the applicable laws.

5. PROCESSING THE INFORMATION

Stellapps may process Your Information where such relevant Information is required to be Processed for the following, but not limited to, Stellapps purposes:

- The fundamental reason behind collecting Your Information is to support and facilitate Your effective use of various features and services as provided on Our Website and applications and by Our products.
- We use the Information for enhanced behaviour of our applications, and Your user experience.
- We also use the Information to be able to provide value added services to the dairies, farmers, agents, customers, vendors, extension staff, financial and insurance institutions, banks etc. We select and track Your preferences to provide You with a customized experience, to notify You of any updated information and new developments/features and other related functions offered by our products, applications and Website, to otherwise support Your relationship with Us and to prevent fraud and unlawful use.

It is Our policy to limit the Information collected to only the essential Information required to offer the services effectively and efficiently and cater to the requirements of the emerging needs of the various stakeholders in the dairy ecosystem and also to develop the digital access network to digitize the dairy supply chain and enable financial inclusion of the dairy farmers.

By accepting the terms of this Policy, You understand, agree and recognize that Our storage and processing of Your Information is for a purpose associated with a function or an activity of the Website and business of the Company. You further understand, agree and acknowledge that You may be required to provide Information that is classified as “Sensitive Personal Information” as per applicable laws for Us to provide various services.

Please note that, it is entirely up to the discretion of the User to provide this Information.

6. DISCLOSURE OF INFORMATION

We do not sell, trade or rent Your Information to any third party, unless We have been expressly authorized by You either in writing or electronically to do so.

We may disclose Your Information solely in the legitimate conduct of the business to deliver services to meet Your demands and offer you the services. We may use a range of service providers and contractors to help us maximize the quality and efficiency of our services and our business operations. This means that third-party individuals and organizations may sometimes have access to Information held by the Company and may collect it for process or use it on behalf of the Company. For this reason, You hereby agree that for every authorization which You grant to us in this Policy, You also grant to any third party that we may hire or enter into a contract with for conducting our business and for providing You the services. We require our service providers and contractors (third-party individuals and organizations) to ensure at least the same level of data protection (if not more) that is adhered by Us and be under appropriate confidentiality requirements, maintain adequate technical and network security and not to use or disclose such information for any unauthorized purposes.

We may also release information when We believe, in good faith, that such release is reasonably necessary to (1) comply with legal or regulatory requirements; (2) enforce or apply terms of use of our Website; (3) enforce or apply terms of use of our products and applications or (4) protect our rights, property or safety of the rights of others.

In case Stellapps is merged with or acquired by another business entity, it will be required to transfer all Your Information to such merging or acquiring entity. In such a case, Stellapps will take all reasonable efforts to make sure that the Information is protected by the merging or acquiring entity, in conformity with applicable laws.

All payments for the services availed on the Website and towards the usage of our products and applications shall be made on the secured payment gateway or by other agreed mode(s). We shall use necessary measures to protect the payment gateway from any unauthorized use, however, We shall not be responsible for any such use which is beyond our reasonable control or which may result in a "Force Majeure Event" (as defined in this Policy).

7. RIGHTS OF THE USERS/CUSTOMERS

- You have the right to review the Information provided by You and correct or amend such Information, if necessary.
- You have the right to withdraw Your consent to the use of Your Information by Us and also the right to get Your Information erased/deleted which will lead to the User not

being able to avail services from Us. The erasure/deletion of Information is subject to Us retaining the Information for as long as required under applicable law.

- You have the right of data portability. Data portability is the ability to obtain some of Your Information in a format You can move from one service provider to another. Depending on the context, You may also be entitled to request copies of Information that You have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this Information to another service provider (where technically feasible).

For exercising any of the above-mentioned rights, you can contact Us via e-mail on info@stellapps.com

8. CAREERS

If You apply for jobs through the Web Site, You accept that the application will be Processed by Stellapps. The Company will use the Information supplied by the applicants for the purpose of Processing the application. The applicant shall have the right to consult their Information, to correct the Information, if necessary, and to withdraw their consent to the use of their Information.

9. RETENTION OF YOUR INFORMATION

The Company will retain Your Information only for as long as is necessary for the purposes set out in this Policy. We will retain and use Your Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

10. LEGAL COMPLIANCE:

We abide by all the applicable laws in force as well as the mandates of government agencies. We will disclose any Information about You to government or law enforcement officials that We, in Our sole discretion, believe necessary or appropriate to respond to claims and legal processes, to protect the property and rights of the Company or a third party, to protect the safety of the public or any person, or to prevent or stop any illegal, unethical or legally fraudulent activity. We may also provide Your Information to various regulatory authorities upon any demand or request from them.

We may provide Your Information, in connection with a merger, acquisition, reorganization or sale of assets or in the event of insolvency or bankruptcy of the Company.

11. SECURITY:

In compliance to our Information Security Policy, we adopt reasonable security measures including those as required under the applicable law to ensure adequate security of Your Information.

We strive to work towards the security, integrity and privacy of Your Information and to protect Your Information against unauthorized disclosure, access or destruction to the extent reasonably possible by Us. Notwithstanding anything contained in this Policy or elsewhere, We shall not be held responsible for any loss, damage, breach of security or misuse of Your Information, if such loss, damage or misuse takes place as a result of a Force Majeure Event. Further, if Stellapps believes that the harm is grievous in nature which is likely to result in a risk to Your rights and freedoms, We will notify You of such breach of security or safety of Your Information as soon as We have had a chance to review the nature and extent of such breach.

12. LINKS TO OTHER SITES:

The Website and Our products and applications may provide third party content and links to other websites. We do not provide Your Information to these third-party websites unless mandated under any applicable laws at that time.

The links to other websites are operated by third parties and are not controlled by, or affiliated to, or associated with Us unless expressly specified on the Website and Our products and applications. Therefore, We do not make any claims concerning the privacy practices or policies of such third parties or terms of use of such websites, nor do We control or guarantee or endorse the accuracy, integrity, or quality of the information available on such websites. Any information provided by You to such third party websites shall be governed in accordance with the privacy policies of the respective websites and it is strongly recommended that You review the privacy policy on any such websites prior to using such websites.

13. PHISHING:

Identity theft and the fraudulent practice currently known as "phishing" are of great concern to Us. Phishing is an attempt to acquire personal/sensitive information which the legitimate organization already has. Safeguarding information to help protect You from identity theft is a top priority. We do not and will not, at any time, request Your credit card information or national identification numbers in a non-secure or unsolicited e-mail or telephone communication.

14. COOKIES:

Stellapps uses Cookies across its Website to improve performance and enhance the experience. Cookies can be used for a variety of purposes such as remembering your preference, measuring your activity and optimizing your user experience.

Usage of Cookies

When consulting the Web Site, Cookies may get placed on Your computer, mobile or tablet. Cookies could contain the following data:

- Information about the browser; an identifier, in the form of a unique identification number.
- An expiration date (some Cookies only)

Cookies used by Stellapps and its purposes:

Following are the Cookies we use and why:

- Google Analytics (utma; utmb; utmc; utmz)

These Cookies are used to collect information about how visitors use Our Site. We use the information to compile reports and to help us improve the site. The Cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

Purpose for which Cookies are used includes but not limited to:

Generally, Cookies perform the following functions:

- Enabling our Web Site to function properly -

Some Cookies are essential for the functioning of our Web Site. For example, Cookies ensure that you are shown the correct webpages for your location, or to identify when we have a broken link or technical issue with the Web Site.

- Analyzing visitor's behavior -
We may use Cookies to analyze how Our visitors use our Web Site and to monitor Web Site performance. This allows Us to provide a high-quality experience by making sure that Our content and layout remains relevant to You. For example, Cookies to keep track of which pages and links are most popular and which are not providing the information that's required by Our visitors.
- Optimizing and personalizing -
Cookies are used to optimize the webpages that You visit and to personalize the content that is shown to You across all our digital assets, based on Our understanding of Your requirement.

Manage your Cookies

You can control whether to accept Cookies or not. If You decide to not accept Cookies, some features and services on Our Web Site will not function properly.

If You prefer not to accept Cookies, You can either:

- Change Your browser setting to notify when You receive a Cookie, which gives You the discretion to choose whether or not to accept it; or
- Set Your browser to automatically not accept any Cookies. You can manage Cookies in the privacy settings of the web browser You are using. Please keep in mind that if You use Your browser settings to block all the Cookies, You may not be able to access parts of Our or others' website.

You can modify the Cookies setting by the links provided below. These links will guide You through the process of modifying Your browser settings:

- Apple Safari –
<https://support.apple.com/en-in/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Google Chrome –
<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>
- Microsoft Internet Explorer –
<https://support.microsoft.com/en-in/help/17442/windows-internet-explorer-delete-manage-cookies>

- Mozilla Firefox –
<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

15. CONTACT US:

If You have any questions about this Policy, the practices of the Company or Your dealings with the Website/application/equipment, You can contact Us via email on: info@stellapps.com

16. GRIEVANCE OFFICER

Please find below the details of the Grievance Officer:

Name: Mr. Yawar Usmani

E-mail: info@stellapps.com

If You wish to make a complaint regarding any violation of the provisions of the Policy, You may send a written complaint to the Grievance Officer, who shall redress the complaint in accordance with the provisions of the Information Technology Act, 2000 and Rules made thereunder.

17. GOVERNING LAW

Please be informed that any proceedings arising out of or relating to Your use of this web site/application/equipment/products, its content and services will be subject to the laws of India and the state of Karnataka and the courts in Bengaluru shall have exclusive jurisdiction.

18. MODIFICATIONS

The Company reserves the right to modify or amend this Policy at any time with or without notice for legal, administrative and technical reasons. It is important that You review the Privacy Policy for updates. The effective date will be displayed at the beginning of this Policy.