

# PRIVACY POLICY

This Privacy Policy ("**Policy**" or "**Privacy Policy**") outlines the types and categories of Personal Information (as defined below) that we may collect and receive from you, how we may use that information, and with whom we may share it. The Policy further describes the steps we take to ensure the confidentiality, and security of the information that you provide to us through our website at("Website"). Please read this Policy carefully before using the Platform or submitting any Personal Information to Aereo. This Policy is a part of and incorporated within, and is to be construed in consonance with, the Terms published on the Website ("Terms").

## 1. Introduction

- 1.1 Aarav Unmanned Systems Private Limited respects the privacy of individuals visiting our website and/or web application and/or any mobile applications that may be published by us (the "**Platform**"). For the purpose of this Policy, wherever the context requires, any reference to the words "**Aarav**", "**Aereo**", "**AUS**", "**we**", "**our**" or "**us**" shall mean and include our affiliates and assigns and any reference to the words "**you**", "**yours**" or "**user(s)**" shall mean and include any individual accessing and/or using the Platform and in the case of an entity or business, then such authorised representative of the entity or business who is accessing and/or using the Website. The term "**Services**" refers to any services offered by Aereo whether on the Platform or otherwise, as may be further detailed out in the Terms. All other capitalized terms used but not explicitly defined herein shall have their respective meanings given to them under the Terms.
- 1.2 Your use/access/browsing of the Platform or the Services through any means shall signify your acceptance of the Terms, this Privacy Policy and your agreement to be legally bound by the same. This Privacy Policy and all matters relating to your access to, or use of the Platform and the Services thereunder shall be governed by and construed in accordance with the laws of India without giving effect to any principles of conflicts of law.
- 1.3 The Privacy Policy does not apply to the procedures and practices followed by entities that are not managed, owned or controlled by us or to the people that are not engaged, employed or managed by us.
- 1.4 If you have questions or concerns regarding this Policy, you can contact us at 080-25212997 or email us at connect@aereo.io.

## 2. Privacy Statement

2.1 The protection of your Personal Information is of great importance to Aereo. In this Privacy Policy, we will disclose what kind of information is collected from the users. It will also specify why the Platform collects this information, the modes and means by which it will be used, and the entities or persons who will have access to this information. Additionally, this Privacy Policy also intends to inform you about how Aereo, acting as data controller, collects and processes your Personal Information that you submit or disclose to us. We also act as a data controller when we process your Personal Information received or obtained through third parties.

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- 2.2 This Privacy Policy is published pursuant to and in compliance with:
  - a) Section 43A of the Information Technology Act, 2000 ("the Act"); and
  - b) Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("**Data Protection Rules**").
- 2.3 If you do not wish your Personal Information to be used by us as set out in this Privacy Policy, please do not provide us with your Personal Information. Please note that in such a case, we may not be able to provide you with our Services, you may not have access to and/or be able to use some features of the Platform, and your customer experience may be impacted.

## 3. Information that may be collected from you

- 3.1 We collect the information provided by you on the Platform while availing the Services offered therein as well as information we learn about you from your visits to our Platform and other websites accessible from it. For the purposes of this Policy, "**Personal Information**" shall have the same meaning assigned to it under Regulation 2(1)(i) of the Data Protection Rules and includes User Information (as described under the Terms).
- 3.2 We may collect additional information in connection with Comments left by users on the Platform, in the manner specified under the Terms. We also monitor customer traffic patterns and Platform use, which enables us to improve the Services we provide. We will collect only such information as is necessary and relevant to us to provide you with the Services available on the Platform.
- 3.3 In order to improve user experience with the Platform and lend stability to our Services to you, we may collect information or employ third party plugins that collect information about the devices you use to access our Services, including the Personal Information, hardware models, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, mobile network information, installed applications on device and phone state. The information collected thus will be disclosed to or collected directly by these plugins and may be used to improve the content and/or functionality of the services offered to you.
- 3.4 We collect and store data from you, through our interactions with you and through our Services for a variety of purposes (described below), including to operate effectively and provide you with the best experiences with our Platform. Some of this information is provided by you to us, such as when you provide Personal Information while availing the Services offered on the Website. We receive some information by collecting data about your interactions, use, and experience with our Services, Platform and from communications between you and us.
- 3.5 While you use the Platform, we may have automatic access to (receive and collect) certain anonymous information in standard usage logs through our web server, obtained from cookies (described below) sent to your browser from web server cookies stored on your hard drive, including but not limited to:
  - a) computer-identification information;

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- b) IP address, assigned to the computer which you use;
- c) the domain server through which you access our service;
- d) the type of computer system you are using; and
- e) the type of web browser you are using.
- 3.6 While you are accessing the Platform and availing the Services offered therein, Personal Information collected about you may include:
  - a) first and last name, in case of an individual;
  - b) company name;
  - c) email addresses;
  - d) contact number(s);
  - e) website link(s);
  - f) purpose of contacting Aereo; and
  - g) any miscellaneous information entered by the user as remarks.
  - We may also collect the following information concerning:
    - a) The pages you visit/access;
    - b) The links you click on the Website; and
    - c) The number of times you access the page.

## 4. Use of Information:

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- 4.1 We use the information collected from you through our Platform for the following purposes:
  - a) to provide, personalize, maintain and improve our Services;
  - b) to carry out our obligations arising from any contracts entered into between you and us and to provide you with the relevant information and services;
  - c) to administer and enhance the security of the Platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - d) to provide you with information about services we consider similar to those that you are already using, or have enquired about, or may interest you;
  - e) to understand our users (what they do on our Services, what features they like, how they use them, etc.), improve the content and features of our Services, modify or develop new Services for our Platform, process and complete your requests, provide customer support, process and respond to your queries;
  - f) to generate and review reports and data about, and to conduct research on, our user base and Service usage patterns;
  - g) to allow you to participate in interactive features of our Services, if any;
  - h) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
  - i) to carry out academic research with academic partners.
- 4.2 We use your contact information to send you:
  - a) updates regarding the status of Services/Service requests availed or requested by you;
  - b) changes in the service policies or the Terms;

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- c) event based communications such as order information, renewal notices, invites, reminders and the like; and
- d) to reach out to for any other reason as may be necessary.
- 4.3 We use anonymous Website traffic information to:
  - a) recognize your usage privileges to the Website;
  - b) administer and manage smooth functioning of the Website by diagnosing problems; and
  - c) track your session and activities so that we can understand better how you use the Website.
- 4.4 We may combine the information that we receive from third parties with the information you provide us with through the Platform and information we collect about you for the purposes set out above. Further, we may anonymize and/or de-identify information collected from you through the Services or via other means, including via the use of third-party web analytic tools. As a result, please note that our use and disclosure of aggregated and/or de-identified information is not restricted by this Policy, and it may be used and disclosed to others without limitation.
- 4.5 For the purpose of general administration of the Website, we analyze the log files of the Aereo Platform that may contain Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring, app crashes, page viewed and exit websites and applications, operating system, date/time stamp, and clickstream data.

## 5. Time and manner of collection of Information

- 5.1 Anonymous traffic information on the Website is collected by us from you when you visit the Website.
- 5.2 We collect Personal Information from you when you access or contact us through the Platform, wish to access whitepapers uploaded on our Platform and when you avail the Services provided by us through our Platform. To this end, we may require certain Personal Information from you on our Platform in order to be able to fulfill your requested Service(s).
- 5.3 We are the sole owners of your information collected by us at different points on the Website. We will collect Personal Information about you only in the manner set out in this Policy.
- 5.4 The Website may contain links to other websites. We are not responsible for the privacy practices of such websites which we do not own, manage or control.
- 5.5 We may at certain times make chat rooms, forums, instant messenger and message boards and other services available to you. Please understand that any information that is disclosed in these areas becomes public information. We have no control over its use and you should exercise caution when disclosing your Personal Information to anyone.
- 5.6 If you use a bulletin board or chat room on this website, you should be aware that any personally identifiable information you submit there can be read, collected, or used by

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other users of these forums, and could be used to send you unsolicited messages. We are not responsible for Personal Information you choose to submit in these forums.

## 6. Disclosure of Information

- 6.1 *With service providers:* We may share your information with our suppliers, consultants, marketing partners, research firms and other service providers or business partners, to support our business and to enable provision of the Services. For example, your information may be shared with outside vendors to send you emails and messages or push notifications to your devices in relation to our Services, to help us analyze and improve the use of our Services.
- 6.2 *With academic partners:* We may share your information with our academic partners for the purpose of carrying out academic research.
- 6.3 *For crime prevention or to assist in investigations:* We may share this information with governmental agencies, law enforcement agencies or other companies assisting us, when we are:
  - a) obligated under the applicable laws or in good faith to respond to court orders and processes; or
  - b) detecting and preventing against actual or potential occurrence of identity theft, fraud, abuse of Services and other illegal acts;
  - c) responding to claims that an advertisement, posting or other content violates the intellectual property rights of a third party;
  - d) under a duty to disclose or share your personal data in order to enforce the Terms and other agreements, policies or to protect the rights, property, or safety of Aereo, our customers, or others, or in the event of a claim or dispute relating to your use of our Services. This includes exchanging information with other companies and organisations for the purposes of fraud detection and credit risk reduction.
- 6.4 *For internal use:* We may share your information with any present or future member of our "Group" (as defined below) or affiliates for our internal business purposes. The term "Group" means, with respect to any person, any entity that is controlled by such person, or any entity that controls such person, or any entity that is under common control with such person, whether directly or indirectly, or, in the case of a natural person, any Relative (as such term is defined in the Companies Act, 2013 to the extent applicable) of such person.
- 6.5 With advertisers and advertising networks: We may work with third parties such as network advertisers to serve advertisements on the Aereo Platform and on third-party websites or other media (e.g., social networking platforms). These third parties may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their advertisements and to personalize advertising content to you. While you cannot opt out of advertising on the Aereo Platform, you may opt out of interest-based advertising on third party sites and through third party advertising networks (including DoubleClick Ad Exchange, Facebook Audience Network and Google AdSense). Opting out means that you will no longer receive personalized advertisements by third party networks from which you have opted

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out, which is based on your browsing information across multiple sites and online services. If you delete cookies or change devices, your opt out may no longer be effective.

- 6.6 Further, please note that the Platform stores your data with the cloud platform of Amazon Web Services provided by Amazon Web Services, Inc., which may store this data on their servers located outside of India. Amazon Web Services has security measures in place to2 protect the loss, misuse and alteration of the information, details of which are available at https://aws.amazon.com/. The privacy policy adopted by Amazon Web Services are detailed in https://aws.amazon.com/privacy. In the event you have questions or concerns about the security measures adopted by Amazon Web Services, you can contact their data protection / privacy team / legal team or designated the grievance officer at these organisations, whose contact details are available in its privacy policy, or can also write to our Grievance Officer at the address provided below.
- 6.7 We disclose your Personal Information to third parties where necessary in order to fulfill the purpose for which you provide it.
- 6.8 We may also share your information other than as described in this Policy, if we notify you and you consent to the sharing.
- 6.9 Additionally, we may have certain mechanisms and policies in place in order to identify data processing activities that may result in a high risk to your rights and freedoms. If any such data processing activity is identified, we will assess it internally and either stop it or ensure that the processing is compliant with this Privacy Policy or that appropriate technical and organizational safeguards are in place in order to proceed with it.

## 7. User Consent

- 7.1 By using the Platform and the Services, you agree and consent to the collection, transfer, use, storage, disclosure and sharing of your information as described and collected by us in accordance with this Policy. If you do not agree with the Policy, please do not use or access the Platform.
- 7.2 Providing your Personal Information to us is entirely voluntary and only necessary if and when the user wishes to access all features of our Platform and avail the Services thereunder. If your Personal Information or email address changes, or if you no longer wish to avail our Services, you may correct, update, delete or discontinue your use by emailing us at connect@aereo.io.

## 8. Opt-Out

8.1 If you wish to withdraw your consent for the use and disclosure of your personal information in the manner provided in this Policy or you want your data to be deleted, please write to us at connect@aereo.io. Please note that we may take time to process such requests, and your request shall take effect no later than 21 (twenty-one) business days from the receipt of such request, after which we will not use your personal data for any processing unless required by us to comply with our legal obligations. We may not be able offer you any or all Services upon such withdrawal of your consent.

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8.2 In the event, if you have raised a request for withdrawal of your consent for the use and disclosure of your personal information by us, and thereafter you place an order on our Platform via availing our Services, in such cases, you hereby consent to receiving any/all updates or communications limited to your placed order and the status report that shall be sent to you by us over your mail/sms/whatsapp.

# 9. Cookie Policy

- 9.1 The Aereo Platform and third parties with whom we partner, may use cookies, pixel tags, web beacons, mobile device IDs, "flash cookies" and similar files or technologies to collect and store information with respect to your use of the Services and third-party websites.
- 9.2 Cookies are small files that are stored on your browser or device by websites, apps, online media and advertisements. We use cookies and similar technologies for purposes such as:
  - a) authenticating users;
  - b) determining the relevance of Services on the Website; and
  - c) analyzing site traffic and trends, and generally understanding the online behaviors of users who interact with our Website and Services.
- 9.3 A pixel tag (also called a web beacon or clear GIF) is a tiny graphic with a unique identifier, embedded invisibly on a webpage (or an online ad or email), and is used to count or track things like activity on a webpage or ad impressions or clicks, as well as to access cookies stored on users' computers. We use pixel tags to measure the popularity of our various pages, features and Services. We also may include web beacons in e-mail messages or newsletters to determine whether the message has been opened and for other analytics.
- 9.4 We may also allow third parties to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs and other technologies to identify your device when you visit the Aereo Platform and use our Services, as well as when you visit other online sites and services.
- 9.5 To modify your cookie settings, please visit your browser's settings. By using our Services with your browser settings to accept cookies, you are consenting to our use of cookies in the manner described in this Clause 8.

## 10. Miscellaneous

10.1 **Modification of the Policy:** We may at any time, and at our discretion, modify this Policy. Subsequent to any modification of this Policy, we will inform you of the modifications by publishing a notification on the Website regarding the modified Policy. You can access the latest version of the Policy at any given time on the Website. You should regularly review the Policy on the Website. In the event the modified Policy is not acceptable to you, you should discontinue using the Website. However, if you continue to use the Website or the Services made available by us then you shall be deemed to have agreed to accept and abide by the modified Policy.

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- 10.2 **Data Security Arrangements:** We have in place appropriate technical and security measures to secure the information collected by us. As such, we store your data on protected servers and have placed in place adequate storage measures to deter unauthorized entry, processing, usage, release, copying, alteration, and disposal of your data. However, we cannot be held liable for any unauthorized use of your data by third parties that are entirely attributable to factors outside our control. We hereby acknowledge and are aware that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through the Aereo Platform. Once we have received your information, we will use strict physical, electronic, and procedural safeguards to try to prevent unauthorized access.
- 10.3 **Grievance Officer:** In accordance with Section 43-A of the Act read with Rule 5(9) of the Data Protection Rules, the name and contact details of the Grievance Officer designated for the redressal of grievances or discrepancies raised by users who have provided User Information on the Website are as follows:

Name: Vipul Singh Address: 3rd Floor, #3, 80 Ft Road, MCHS Layout, Jakkur, Bangalore, India - 560064 Phone: 080-25212997 Email: <u>info@aereo.io</u>

Please report any abuse or violation of the Policy that you may have come across to info@aereo.io.

10.4 **Waiver:** Any waiver of any provision of the Policy, or a delay by Aereo in the enforcement of any provision hereunder, shall neither be construed as a continuing waiver nor create an expectation of non-enforcement of that or any other breaches of the same kind or other provisions of the Policy by us.