

### Version Control

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<b>Classification</b>	<b>Internal Use</b>

<b>Version Number</b>	<b>Date of Release</b>	<b>Nature / Description of Change</b>	<b>Prepared / Changed By</b>	<b>Reviewed By</b>	<b>Approved By</b>
1.0	1-Jan-2023	First Release	Sujata	Hemasundar	Pavan
1.1	19-Dec-2025		Karuna Kamath	Hemasundar	Pavan

## Privacy Policy

This Privacy Policy describes how AquaExchange (“Company”, “we”, “us”, or “our”) collects, uses, discloses, and protects personal data when you access or use our website and services (the “Services”).

We are committed to protecting personal data in accordance with applicable data protection laws, including:

- EU GDPR
- India DPDPA, 2023

### 1. Scope

This policy applies to website visitors, users, customers, and business contacts.

### 2. Roles

**Data Controller:** When we determine the purposes and means of processing personal data (e.g., website users, direct customers).

**Data Processor:** When we process personal data on behalf of enterprise customers under contractual instructions.

### 3. Data Collected

Identity & contact data, account data, technical data, and communications.

We may collect the following categories of personal data:

#### a) Identity & Contact Data

- Name
- Email address
- Phone number
- Company name
- Job title

#### b) Account & Usage Data

- Login credentials
- Account identifiers
- User actions within the application
- Service usage metrics

**c) Technical Data**

- IP address
- Browser type and version
- Device identifiers
- Operating system
- Log files and timestamps

**d) Communication Data**

- Customer support requests
- Email correspondence
- Feedback and survey responses

**We do not intentionally collect sensitive personal data** (such as health data, biometric data, sexual orientation, or financial card details) unless explicitly required, disclosed, and lawfully permitted.

**4. Purpose of Processing** (Service delivery, security, analytics, support, and legal compliance)

We process personal data for the following purposes:

- Providing, operating, and maintaining the Services
- User authentication and account management
- Customer support and communications
- Security monitoring, fraud prevention, and abuse detection
- Improving service performance and functionality
- Legal, regulatory, and contractual compliance
- Business operations and internal analytics

**5. Lawful Basis**

Contract, legal obligation, legitimate interest, and consent.

We rely on one or more of the following lawful bases:

- Performance of a contract
- Compliance with legal obligations

- Legitimate interests, such as security, fraud prevention, and service improvement
- Consent, where required (e.g., marketing communications)

Where consent is relied upon, it may be withdrawn at any time.

#### **6. Cookies** (Used for functionality, security, and analytics)

We use cookies and similar technologies for:

- Website functionality
- Security
- Analytics
- Service performance

Tracking data is generally collected in an **aggregated or anonymized form**. Where tracking is associated with authenticated users, it is used strictly for service delivery, security, and operational purposes and disclosed accordingly. You may control cookies through your browser settings.

#### **7. Retention**(Data retained only as necessary and deleted or anonymized thereafter)

We retain personal data only for as long as necessary to fulfil the purposes described in this Policy or as required by law.

Retention periods are determined based on:

- Legal and regulatory requirements
- Contractual obligations
- Business necessity

Upon account termination, personal data is deleted or anonymized within defined retention periods unless legally required otherwise.

#### **8. Sharing** (Shared with service providers, authorities, or during corporate changes)

We may share personal data with:

- Authorized employees and contractors
- Service providers and sub processors (e.g., hosting, analytics, customer support)
- Legal or regulatory authorities where required by law
- Successor entities in the event of a merger, acquisition, or restructuring

All third parties are contractually required to protect personal data and process it only for authorized purposes.

### **9. Cross-Border Transfers** (Protected using appropriate safeguards)

Personal data may be transferred and processed outside your country of residence.

Where such transfers occur, we ensure appropriate safeguards, including:

- Contractual protections
- Security measures
- Compliance with applicable cross-border transfer requirements under GDPR and DPDPA

### **10. Security** (Technical and organizational safeguards implemented)

We implement appropriate technical and organizational measures to protect personal data, including:

- Access controls
- Encryption
- Logging and monitoring
- Secure development practices

While we strive to protect personal data, no system can be guaranteed to be 100% security

### **11. Rights**

You have the right to:

- Access your personal data
- Rectify inaccurate data
- Request erasure
- Restrict or object to processing
- Data portability
- Withdraw consent
- Lodge a complaint with a supervisory authority

Requests can be made using the contact details below.

### **12. Children**

Our Services are not intended for individuals under 18 years of age. We do not knowingly collect personal data from children.

### **13. Updates**

We may update this Privacy Policy periodically.

Material changes will be communicated through appropriate channels.

#### **14. Contact**

For privacy-related questions or requests, contact us at:

**Email:** [info@aquaexchange.com](mailto:info@aquaexchange.com)

Where applicable, unresolved grievances may be escalated to the relevant data protection authority.

Mr. Hemasundar Dhavili (Grievance Officer) [www.aquaexchange.com](http://www.aquaexchange.com) AquaExchange  
Agritech Private Limited 9-1-45/3/2, Varun Residency, New Resapuvanipalem,  
Visakhapatnam, Andhra Pradesh, India, 530013, Ph: 1800-102-2379