

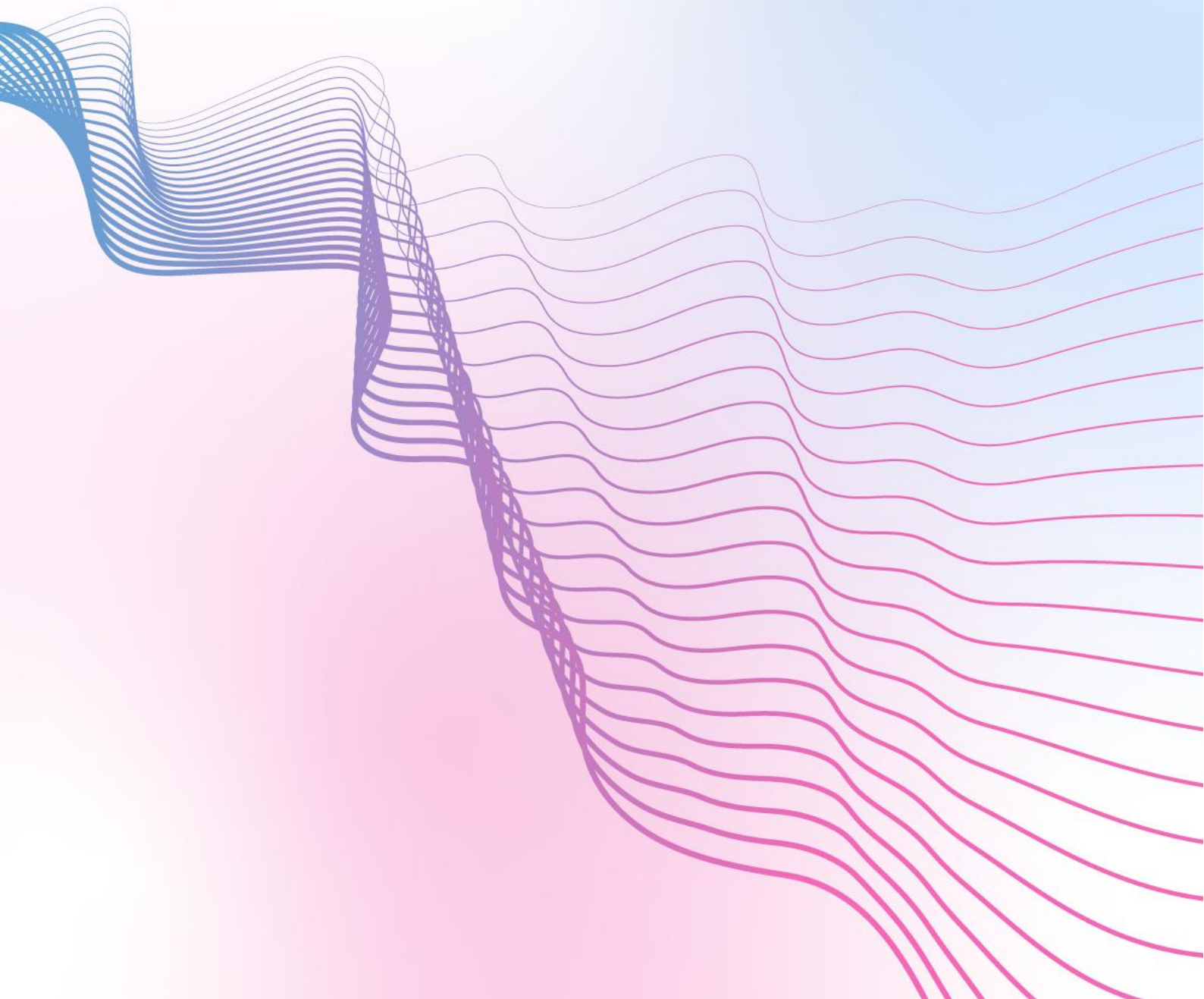


Excelra Knowledge Solutions Pvt. Ltd. & its Affiliates

Privacy Policy | Version: 3.0

03 June 2026

CONFIDENTIAL



Copyright Notice

Copyright © 2026 Excelra All Rights Reserved.

Excelra Knowledge Solutions Private Limited, 7th Floor, Wing B, NSL SEZ Arena Town Centre, Plot No.6, Survey No.1, IDA Uppal, Hyderabad–500039, India.

This document is copyrighted, and all rights are reserved. This document may not, in whole or in part, be copied, photocopied, reproduced, translated, or reduced to any electronic medium or machine-readable form without prior consent, in writing, from an authorized representative of Excelra.

First published and distributed on December 26th, 2018.

Document Control	
Document Name	Privacy Policy
Location	Excelra SharePoint
Policy Review Frequency	Annually or Whenever Necessary
Policy Owner	Laasyaa P Chadaga
Responsible Executive	Priyanka Padwal
Version Number	3.0

Version No.	Date	Source of Change	Section	Addition/Modification/Deletion	Brief Description of change
1.0	26-Dec-2018				
1.0	26-Dec-2019				No change
1.0	10-Nov-2021				No Changes to the Document.
1.1	15 Dec 2021	Yearly Review			No changes to document
1.2	18 Aug 2022				Review No changes to document
1.2	9 Oct 2023				Review No changes to document
1.3	7 Jan 2025	Yearly Review		A	Change of Reviewer, Approver
2.0	18 Sep 2025			A	Added Data Subject Rights and aligned with DPDPA clause requirements
3.0	27 April 2026				Amended to reflect UK data protection laws

IP Creator, IP Expert and Approver			
Version No.	Role	Name	Email
2.0	Author	Priyanka Padwal	priyanka.padwal@excelra.com

About us

Excelra Knowledge Solutions Private Limited (“**Excelra**”, the “**Company**”, “**We**”, “**Us**”, or “**Our**”), a private limited Company with its registered office at 7th Floor, Wing B, NSL SEZ Arena Town Centre, Plot No.6, Survey No.1, IDA Uppal, Hyderabad–500039, India, is a global data and analytics organization primarily engaged in providing proprietary data assets, data science solutions, and expert services to institutional clients across the life sciences industry (“**Services**”). Information regarding the Services can be accessed through www.excelra.com (the “**Website**”). We place the utmost importance on maintaining the confidentiality, integrity, and security of Your (collectively, “**You**”, “**Your**”, “**Yourself**”, and “**Users**”) Personal Data and information that You share with Us while accessing Our website. Our comprehensive Privacy Policy (defined below) reflects this commitment, which We encourage You to read fully.

About this Privacy Policy

This document (the “**Privacy Policy**”) is applicable to the Excelra Affiliates and explains how information, including Personal Data (defined below), is collected, received, stored, processed, disclosed, transferred, dealt with or otherwise handled by Us through the Website. This policy is not applicable to any information collected offline or via channels other than this website. This Privacy Policy shall be read harmoniously and in conjunction with the Terms.

This Privacy Policy has been designed to align with the requirements of the EU/UK General Data Protection Regulation (GDPR), where applicable, and the Digital Personal Data Protection Act, 2023 (DPDPA) and allied rules in India, where applicable and other global data protection laws of other countries. We will update this Policy to reflect further guidance or rules issued under the applicable laws.

This Privacy Policy does not cover information that You may provide to third-party websites, applications services or advertisers that are not owned or controlled by Us. This includes third parties We advertise on the Website or otherwise or on social media sites where We have a profile. This includes, but is not limited to, communications over third-party messaging platforms, such as WhatsApp. Such information will be governed by the privacy policies of respective third parties, and such sites. Please consult the privacy policies of these third parties for more detailed information.

Please read the Privacy Policy carefully prior to using or registering on the Website or accessing any material, information or availing any Services through the Website.

This policy constitutes a notice to You, as a data principal/data subject, regarding the collection, use, and processing of Your Personal Data; and does not require any physical, electronic, or digital signature to be valid or binding. By clicking on the “Accept” or “Confirm” button at the time of signing up, You acknowledge that You have read and understood this Privacy Policy and agree to be bound by its terms.

This Privacy Policy is governed by one fundamental principle – maintain Your trust and confidence when handling Your Personal Data. Our Privacy Policy broadly lays out the following:

1. The kind of Personal Data that We will collect from You, and the purpose and lawful basis of collection of such information. Your right to choose what Personal Data You provide to Us and how such information is used. We collect and process Your Personal Data to provide and improve Our Services. We will also offer You an explicit Personal Data opt-in or opt-out choice, where appropriate. However, please note that We may only be able to provide You with Our Services if You provide Us with the requested information.
2. The circumstances where We disclose Your Personal Data to third parties and the manner in which such third parties may utilize Your Personal Data.
3. The practices and procedures adopted by Us in ensuring the privacy, security, and confidentiality of Your Personal Data when sharing such data with third parties, such as Our third-party service providers to facilitate provision of Services, or for such third parties to provide their services.
4. Our efforts to protect Your Personal Data by maintaining appropriate security measures / protocols, that may include, physical, electronic, and procedural safeguards. We will train Our employees to handle Personal Data properly. When We use other companies to provide Services for Us, We require them to protect the Personal Data We receive from You..
5. How We handle Your information when You visit the Website, receive emails, SMSs, and any other communications from Us.
6. How You can contact Us in relation to any Personal Data We collect from You, and the manner in which Your grievances will be redressed.

Terms of use

At Excelra, accessible from www.excelra.com, one of Our main priorities is the privacy of Our visitors. This Privacy Policy document contains types of information that is collected and recorded by Excelra and how We use it.

If You have additional questions or require more information about Our Privacy Policy, do not hesitate to contact Us through email at dpo@excelra.com

Website Analytics

We use web analytics tools provided by service partners such as Google Analytics, HubSpot, DealFront etc., to collect information about how You interact with Our website, including what pages You visit, what site You visited prior to visiting Our website, how much time You spend on each page, what operating system and web browser You use and network, IP information etc. We use the information provided by these tools to improve Our Services. These tools place persistent cookies, web storage elements or other technologies in Your browser to identify You as a unique user the next time You visit Our website. The information collected from the cookie may be transmitted to and stored by these service

partners on servers in a country other than the country in which You reside. Though information collected does not include Personal Data such as name, address, billing information, etc., the information collected is used and shared by these service providers in accordance with their individual privacy policies. You can choose to disable cookies through Your individual browser options when You first visit Our webpages, or by utilizing settings in Your browser or third-party tools.

Privacy Policies

You may reach out to the website of advertising partners to find the Privacy Policy for each of the advertising partners of Excelra.

Third-party ad servers or ad networks use technologies like cookies, JavaScript, GoogleAds, LinkedInAds

or Web Beacons that are used in their respective advertisements and links that appear on Excelra, which are sent directly to users' browser. They automatically receive Your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that You see on websites that You visit.

Note that Excelra has no access to or control over these cookies that are used by third-party advertisers.

Third Party Privacy Policies

Excelra's Privacy Policy does not apply to other advertisers or websites. Thus, We are advising You to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options. You can choose to disable cookies through Your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.

Online Privacy Policy Only

This Privacy Policy applies only to Our online activities and is valid for visitors to Our website with regards to the information that they shared and/or collected in Excelra.

Consent

By using Our website, You hereby consent to Our Privacy Policy and agree to its Terms and Conditions.

Privacy Policy

Excelra cares about Your privacy. Personal Data is any information about an individual if such individual is identifiable by such information, or in relation to such information. While We have specified the exact data sets that We will collect from You in this Privacy Policy (collectively “Personal Data”) along with the purpose of collection, We collect and use Personal Data only as it might be needed for Us to deliver Our Services. We have laid out below broadly, the nature of Personal Data that We will be collecting from You:

Your first name and last name

Your phone number

Your company name

Your business email address

Your country

Your area of Interest

Other data collected that could directly or indirectly identify you.

Our Privacy Policy is intended to describe to You how and what data We collect, and how and why We use Your Personal Data. It also describes options We provide for You to access, update or otherwise take control of Your Personal Data that We process.

If you have questions about Our practices or any of Your rights described below, You may reach Our Data Protection Officer (“DPO”) by contacting Us at dpo@excelra.com. This inbox is actively monitored and managed so that We can deliver an experience that You can confidently trust.

What Personal Data/Information do We collect?

We collect the following information/Personal Data so that We can provide the best possible experience when You utilize Our Services.

From You. The Personal Data We receive from You in this instance involves Your name, Your Company’s name, Your mobile number, Your business email address and Your country, along with such other information provided by You on Our Website.

User communications. We may collect and retain Our correspondence, such as emails or letters into a file specific to You.

Other information and Automatic information (as defined above): Information about how You interact with Our website, including what pages You visit, what site You visited prior to visiting Our website, how much time You spend on each page, what operating system and web browser You use and network, IP information.

Information belonging to children. The Website is not intended for children (i.e., persons below 18 years of age). We neither collect Personal Data nor encourage children to interact with the Website. We do not owe any responsibility to any such User, who is a child, or towards their parents or lawful guardian, as applicable. If We become aware that a person submitting Personal Data is under the permissible age, We will delete the account and any related information from or about a User under the permissible age.

Information belonging to persons with disabilities. The Website and the Services are inclusive and cater to all persons, including persons with disabilities. For the purpose of this Privacy Policy, a person with disability refers to someone with long-term physical, mental, intellectual, or sensory impairment that may hinder their full and effective participation equally with others, but a person who is otherwise competent to contract. If You are a User with a disability and require any assistance to access or use the Website, please contact Us at dpo@excelra.com. We will be happy to serve You and help You through the use of the Website.

However, We may also collect additional information, as notified by Us from time to time, when delivering Our Services to You to ensure necessary and optimal performance.

Where required, the provision of certain Personal Data is necessary for us to enter into or perform a contract with you or to respond to your requests. Failure to provide such Personal Data may result in our inability to provide our services, respond to your enquiries, or otherwise engage with you.

Our lawful basis for processing Your Personal Data

Where the GDPR applies

Our lawful bases for Our processing of your Personal Data (and processing carried out on Our behalf) are as follows:

Consent. In most cases, We will process Your Personal Data based on Your opt in consent as required under applicable law before processing your Personal Data. You can withdraw your consent at any time with effect for the future in the event You do not wish for Us to process Your Personal Data for any specific purpose. **You may withdraw consent to Our processing of Your Personal Data by contacting Us at dpo@excelra.com.** The different instances in which We collect Your Personal Data and the purposes for which We process Your Personal Data have been described in this Privacy Policy. While You have the right to withdraw the consent that You have given, certain Personal Data may be necessary to make available Our Services and We may not be able to provide You with the relevant Services if the Personal Data requested is essential for making available the Service, and is not provided by You, or the consent in relation to it is withdrawn. The legal basis for processing based on Your Consent is Article 6 (1) a) GDPR.

Legitimate interests. Where processing of Your Personal Data is necessary for our legitimate interests (or those of a third party). A legitimate interest is when we have a business or commercial reason to use your Personal Data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. The legitimate interests that apply in respect of the processing of your Personal Data under this Privacy Policy are (i) responding to your enquiries and managing communications; (ii) providing, maintaining, and improving our services; (iii) managing and developing our business relationships; (iv) internal administrative purposes, including record-keeping and reporting (v) conducting direct marketing and business development activities, where permitted by applicable law. . The legal basis for this processing is Article 6(1)(f) GDPR and where the UK GDPR applies, Article 6(1)(ea) GDPR (legally recognized legitimate interests).

Contractual obligations. Where processing of Your Personal Data is necessary to perform Our contract with you or to take steps at Your request before entering into a contract. The legal basis for this processing is Article 6(1)(b) GDPR.

Legal obligations. Where processing of Your Personal Data is necessary to comply with our legal and regulatory obligations. The legal basis for this processing is Article 6(1)(c) GDPR.

Vital interests. Where processing of Your Personal Data is necessary to protect Your vital interests or those of another natural person. This may be, for example, in the case of a serious accident. The legal basis for this processing is Article 6(1)(d) GDPR.

Public interest. Where processing of Your Personal Data is necessary for Our performance of a task carried out in the public interest. The legal basis for this processing is Article 6(1)(e) GDPR.

Where the GDPR does not apply:

We may, in compliance with applicable laws, process Your Personal Data without obtaining Your consent in the event: (i) You voluntarily provide Your Personal Data to Us and do not indicate anything to show that You do not consent to the use of such Personal Data by Us. Further, if You voluntarily provide Your Personal Data to Us for any of the purposes stated below, We shall not process Your Personal Data for any of the other purposes, unless You specifically voluntarily provide Your Personal Data to Us for any and / or all of such other purposes; (ii) the purpose of processing is for fulfilling any legal obligation to disclose any information to the State or any of its instrumentalities subject to such processing being in accordance with the provisions regarding disclosure of such information in any other law for the time being in force; (iii) it is for employment purposes or for defending Ourselves from any loss or liability in the context of employment; (iv) it is for compliance with any judgment, decree, or order issued under any applicable law or any judgment, decree, or order relating to civil contractual claims under any foreign law; (v) it is for responding to a medical emergency involving a threat to life or immediate threat to Your health or of any

other Users' health; (vi) it is for taking measures to provide medical treatment or health services to You or any other User during an epidemic, outbreak of disease or any other threat to public health; (vii) it is for the purpose of taking measures to ensure safety of, or provide assistance or services to, any individual during any disaster, or any breakdown of public order; and (viii) it is in the interest of prevention, detection, investigation or prosecution of any offence or contravention of any law for the time being in force in the relevant jurisdiction.

To the extent that GDPR applies, the legal basis for processing that is necessary for compliance with a legal obligation is Article 6 (1) c) GDPR and in all other cases for processing that is necessary for legitimate interests is Article 6 (1) f) GDPR.

We process Your data when processing is necessary to fulfill our contract with You or to take steps at Your request prior to entering into a contract or fulfill any legal obligation.

You agree and acknowledge that general permissions sought by You at the time of providing Your information on the Website and Your consent thereof for the use of any other Personal Data as set out in this Privacy Policy shall be for the provision of Services.

How We utilize Your Personal Data.

We strongly believe in both minimizing the data We collect and limiting its use and purpose to only that:

- for which We have been given permission,
- as necessary to deliver the Services You purchase or interact with,
- as might be required or permitted for legal compliance or other lawful purposes.

We use the Personal Data collected above to:

- **Deliver and maintain Services** → provide You access to Our platforms, products, and solutions.
- **Improve and optimize Services** → enhance functionality, fix issues, and upgrade performance.
- **Ensure security** → detect, prevent, and respond to fraud, abuse, errors, and security risks.
- **Analytics & insights** → understand how users interact with our services, generate usage statistics, and optimize user experience.
- **Marketing & communication** → send product updates, promotional content, newsletters, and event invites (only with Your consent where required).
- **Customer support** → respond to inquiries, provide technical help, and resolve issues.
- **Legal & compliance** → meet regulatory obligations, enforce our Terms of Use, and protect rights, property, and safety.
- **Business operations** → support internal audits, business reporting, and planning.

Often, much of the data collected is aggregated or statistical data about how individuals use our Services, and is not linked to any Personal Data, but to the extent it is itself Personal Data, or is linked or linkable to Personal Data, We treat it accordingly.

Website Analytics: We use web analytics tools provided by service partners such as Google Analytics, HubSpot, DealFront etc. to collect information about how You interact with Our Website, including what pages You visit, what site You visited prior to visiting Our Website, how much time You spend on each page, what operating system and web browser You use and network, IP information and similar information. We use the information provided by these tools to improve Our Services. These tools place persistent cookies, web storage elements or other technologies in Your browser to identify You as a unique user the next time You visit Our website. The information collected from the cookie may be transmitted to and stored by these service partners on servers in a country other than the country in which You reside. [Though information collected does not include Personal Data such as name, address, billing information (for example) the information collected is used and shared by these service providers in accordance with their individual privacy policies]. You can choose to disable cookies through Your individual browser options when You first visit Our webpages, or by utilizing settings in Your browser or third-party tools. Where we are legally required to do so, we will seek your consent before setting these cookies on our Website and You will be entitled to withdraw Your consent, if you later decide that you do not agree to these cookies being set. Please see our Cookie Notice on website for more information on how we use cookies (and similar technologies).

Automated decision making: We may use Your Personal Data for automated decision-making, including profiling, to improve Our services, personalize Your experience, or for fraud detection and risk management. We comply with applicable data protection laws such as the General Data Protection Regulation (GDPR) and the Digital Personal Data Protection Act, 2023 (India) when applicable, in relation to automated decision-making and profiling.]

How We share Your Personal Data.

Sharing with trusted third parties. We may share Your Personal Data with affiliated companies within Our corporate family, with third parties with which We have partnered to allow You to integrate their services into Our own Services, and with trusted third-party service providers as necessary for them to perform Services on Our behalf, for the purpose of:

- Performing analysis of Our Services
- Communicating with You, such as by way of email or survey delivery
- Customer relationship management.
- Fulfilling Legal and Compliance Obligations

We only share Your Personal Data as necessary for any third party to provide the Services as requested or as needed on Our behalf. These third parties (and any subcontractors) are subject to strict data processing terms and conditions and are prohibited from utilizing, sharing or retaining Your Personal Data for any purpose other than as they have been specifically contracted for (or without your consent).

Communicating with You. We may contact You directly or through a third-party service provider regarding Services You have signed up, such as necessary to deliver transactional or service-related communications, respond to inquiries, and offer customer support. We may also contact You with offers for additional Services We think You'll find valuable if You give Us consent or where allowed based upon legitimate interests. You don't need to provide consent as a condition to purchase Our services. These contacts may include (subject to your preferences):

- Email
- Text (SMS) messages
- Telephone calls

The Company's name and other identifying information help Us tailor Our services to better meet Users' needs and ensure We address their specific requirements. We also use this information for analytics purposes to improve the functionality and User experience of Our Website by analyzing user behavior to identify trends and optimize Our Services accordingly.

Engaging with Our advertising partners. Third-party ad servers or ad networks use technologies like cookies, JavaScript, GoogleAds, LinkedInAds or Web Beacons that are used in their respective advertisements and links that appear on Excelra, which are sent directly to the User's browser. They automatically receive Your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that You see on Websites that You visit.

Note that Excelra has no access to or control over these cookies that are used by third-party advertisers.

Compliance with legal, regulatory and law enforcement requests. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about You to government or law enforcement officials or private parties as We, in Our sole discretion, believe necessary or appropriate to respond to claims and legal process (such as subpoena requests), to protect Our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity We consider to be illegal or unethical

Cookies and Tracking Technologies

We are responsible for obtaining consent for all cookies, including third-party cookies.

We use the following categories of cookies, web storage and access elements or other tracking technologies ("**Cookies**"):

- **Necessary** → Necessary Cookies are required to enable the basic features of this Website, such as providing secure log-in or adjusting your consent preferences. These Cookies do not store any personally identifiable data.
- **Functional** → Functional Cookies help perform certain functionalities like sharing the content of the Website on social media platforms, collecting feedback, and other third-party features.
- **Analytics** → Analytical Cookies are used to understand how visitors interact with the Website. These cookies help provide information on metrics such as the number of visitors, bounce rate, and traffic source.
- **Advertisement** → Advertisement cookies are used to provide visitors with customised advertisements based on the pages You visited previously and to analyse the effectiveness of the ad campaigns.

You can manage or withdraw Your cookie consent at any time by clicking on the consent preferences icon at the bottom left of our website. You can find more information on our use of Cookies in our Cookie Policy available on website.

Transfers of Your Personal Data abroad.

If You utilize Our services from a country other than the country where Our servers are located, your communications with Us may result in transferring Your Personal Data across international borders including to jurisdictions that may not have data protection laws equivalent to those in Your jurisdiction. We may transfer Your Personal Data outside of the UK and/or the European Economic Area (EEA) (as applicable).

Where such transfers occur, We will take all required steps to ensure that Your Personal Data is treated securely and in accordance with applicable data protection laws. This may include implementing appropriate technical, contractual, and organizational measures to protect Your Personal Data during transfer and processing.

Where the GDPR applies, we can only transfer Your Personal Data to another entity in a country outside the UK or European Economic Area (as applicable):

- [if the UK GDPR applies: where the UK government has decided the particular country or international organisation ensures an adequate level of protection of personal information (known as an "Adequacy Regulation") further to Article 45, or Article 45A, of the UK GDPR. A list of countries/international organisations the UK currently has adequacy regulations in relation to is available . We rely on adequacy regulations for the transfers; and/or
- [if the EU GDPR applies; where the European Commission has decided that the particular country or international organisation ensures an adequate level of

protection of personal information (known as an “Adequacy Decision”) further to Article 45 of the EU GDPR. A list of countries the European Commission has currently made adequacy decisions in relation to is available . We rely on adequacy decisions for transfers and/or

- where there are legally-approved standard data protection clauses in place: recognised or issued further to Article 46 of the UK GDPR and/or EU GDPR in place (“SCCs”). We rely on SCCs for the transfers and/or
- where a specific derogation applies under relevant data protection law: including those derogations specified in Article 49 of the GDPR. We do not routinely rely on derogations to transfers Your Personal Data outside of the UK/EEA. We will inform You of transfers made on the basis of a derogation where required to do so under applicable data protection laws.

You can request a copy of the SCCs that we use by contacting dpo@excelra.com.

By using Our services and providing Your Personal Data, You consent to such transfers for the purposes described in this Privacy Policy.

We may use Your Personal Data for automated decision-making, including profiling, to improve Our services, personalize Your experience, or for fraud detection and risk management. We comply with applicable data protection laws such as the General Data Protection Regulation (GDPR) and the Digital Personal Data Protection Act, 2023 (India) when applicable, in relation to automated decision-making and profiling.

Your rights

We provide You with the following rights about Your Personal Data as per applicable laws.

You can exercise these rights by contacting Our Data Protection Officer at: dpo@excelra.com.

Your rights are:

Right to access information. You have the right to ask Us: (i) for a summary of Your Personal Data being processed by Us and the processing activities undertaken by Us with respect to such Personal Data; (ii) the identities of all other third-party entities with whom Your Personal Data has been shared by Us, along with a description of the Personal Data so shared; and (iii) such other information that may be mandated for Us to provide You under applicable law. However, this right has certain limitations as prescribed under applicable law.

Right to modify/ rectify data. You have the right to correct or update any information, including Your Personal Data. In the event You notice that any Personal Data already provided by You is inaccurate or incomplete or needs to be updated, You can ask Us to rectify such Personal Data (if the same cannot be done at Your end through the Website) by contacting dpo@excelra.com. Further, if any Personal Data already provided by You is inaccurate, incomplete, or outdated, then You must give Us the accurate, complete, and up-to-date Personal Data by writing to Us at the email ID provided above, and We shall

accordingly rectify such Personal Data at Our end. We . We urge You to ensure that You always provide Us with accurate and correct information / data to ensure that Your use of Our Services is uninterrupted. In case of any such modification of Personal Data, You may be required to furnish supporting documents relating to the change in Personal Data for verification. Any loss or damage accruing due to provision of inaccurate, incomplete, or outdated information by You, will be Your sole responsibility, to Our total exclusion.

Right to erasure. You have the right to request the deletion or removal of Your Personal Data where there is no compelling reason for Us to keep it, subject to limitations under data protection laws. Such right of erasure can be exercised by writing to Us at dpo@excelra.com, which must be in a format prescribed by the authority, if any. For now, You may write to Us on the above email, to exercise this right. Upon receiving such an erasure request and in the event that the request is upheld, We shall delete Your Personal Data stored by Us as requested. We shall also ensure that any third-party service provider processing Your Personal Data within the scope of your request deletes Your Personal Data [In certain cases, Your Personal Data may be deleted automatically after a period of inactivity. We also retain certain records and logs for a minimum period of one (1) year from the date of processing, after which they are deleted unless required otherwise. Upon such erasure request being made by You, We will undertake the necessary deletion within a reasonable time and will cease processing Your Personal Data, except as may be permitted under applicable law.] Please note that We may not be able to allow You access to Our Website and / or provide Services, subsequent to Your exercising of this right.

Right To Restrict: You have a right to request Us to temporarily or permanently stop processing all or some of your Personal Data in certain circumstances.

Right To Object: You have a right, at any time, to object to Our processing of Your Personal Data under certain circumstances. You have an absolute right to object to Us processing Your Personal Data for the purposes of direct marketing.

Right Not to Be Subject To Automated Decision-Making : You have a right to not be subject to a decision based solely on automated decision making which has legal or similarly significant effects on You, which may include profiling.

Right To Data Portability: In certain circumstances, You can receive Your Personal Data in a structured, commonly used, and machine-readable format e.g. so that you can transfer it to another data controller.

Right To Withdraw Consent: You have the right to withdraw Your consent at any time where processing of Your Personal Data is based on consent.

Right To Lodge A Complaint: You have the right to lodge a complaint with a data protection supervisory authority if You believe Your rights have been violated.

Use of consent manager. You are permitted to give, manage, review or withdraw Your consent provided to Us to process Your Personal Data through a 'consent manager' when available. A consent manager is an entity that is registered with the Data Protection Board

of India. The consent manager is accountable to You and can assist You in providing or withdrawing Your consent which You provided to Us to process Your Personal Data, on Your behalf. Such consent managers must comply with the obligations imposed on them as may be prescribed by the Central Government. This right does not apply under the GDPR.

Right to nominate. You shall have the right to nominate any other individual, who shall, in the event of Your death or incapacity, exercise Your rights in relation to Your Personal Data, per applicable law in India. **This right does not apply under the GDPR.**

Your US Privacy Rights

You may opt-out of sale or sharing via the 'Do Not Sell or Share My Personal Information' link on our website.

If You are a resident of California or other states where applicable, You have the following rights with respect to your Personal Data:

Right to know. The right to know what Personal Data we have collected, used, disclosed and sold about You.

Right to correction. The right to correct inaccurate Personal Data we have collected about You.

Right to Deletion. The right to request that we delete any Personal Data we have collected about You.

Right to Opt-Out of Sale or Sharing for Targeted or Cross-Context Behavioral Advertising.

You have the right to opt-out of the sale of Your Personal Data or sharing of Your Personal Data for targeted or cross-contextual advertising. Excelra does not sell and has not Your Personal Data for money. However, in providing services, we may disclose Personal Data to third parties in ways that may be considered a sale under applicable US law—specifically, where we share certain information with third parties for use in online advertising or third-party data sources that help us better understand our customers. To opt-out of this type of sharing, You can manage your cookies preferences as described above in the section “Cookies and Tracking Technologies.” You can also use the Global Privacy Control (“GPC”) to signal Your opt-out preference. To learn more about the GPC, please visit <https://globalprivacycontrol.org>. If You delete cookies or reset Your device, you may need to set Your preference again to ensure we continue to honor Your preferred choice.

We are responsible for obtaining consent for all cookies, including third-party cookies.

Right to Appeal. If You have concerns about our response to Your rights request, including any decision regarding Your rights, you have the right to appeal.

When You exercise these rights and submit a request to us, we may verify your identity by asking for information about your relationship with us, such as email address on file, loyalty/customer number, recent order number, or the last four digits of Your credit or debit card.

Your exercise of these rights will have no adverse effect on the price and quality of our goods or Services.

How We secure, store and retain Your Personal Data.

We follow legal requirements in relation to the storage and protection of the Personal Data We collect, both during transmission and once received and stored, including utilization of encryption where appropriate.

We retain Personal Data only for as long as necessary for the purposes we collected it for, including to provide the Services and for justifiable legal or business purposes. These might include retention periods:

- mandated by law, contract or similar obligations applicable to Our business operations;
- for preserving, resolving, defending or enforcing Our legal/contractual rights;
- needed to exercise or defend legal claims; or
- needed to maintain adequate and accurate business and financial records

To determine the appropriate retention period for Personal Data, We consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of the Personal Data, the purposes for which We process your Personal Data and whether We can achieve those purposes through other means, as well as the applicable legal, regulatory, tax, accounting or other requirements.

As long as You access and / or use the Website (directly or indirectly), it is Your obligation, at all times, to take adequate physical, managerial, and technical safeguards, at Your end, to preserve the integrity and security of Your data which shall include and not be limited to Your Personal Data.

We or any of Our partners do not assume any liability or responsibility for disclosure of Your Personal Data due to errors in transmission, unauthorised third-party access, or other causes beyond Our reasonable control. You understand and acknowledge that We cannot ensure or warrant the security of any Personal Data You transmit to Us or guarantee that Your Personal Data may not be accessed, disclosed, altered, or destroyed by a breach of any of Our security measures and safeguards. In the event of any actual or suspected security incident, including data breach, We will, immediately upon becoming aware of such a breach, notify You of the same and provide You with information that We may have at the time regarding the nature, extent and timing of such a breach and its impact on You, along with details of the measures that We have adopted to mitigate risks. In such a scenario, We may also provide suggestions on the measures that You may adopt to protect Your Personal Data – We request that You co-operate with Us and implement all such measures to help Us protect Your interests better. We will also report such Personal

Data breach to the Data Protection Board of India and the Indian Computer Emergency Response Team (CERT-In) and undertake such actions and implement such measures as may be directed by the Data Protection Board or CERT-In to protect Your Personal Data. You play an essential role in keeping Your Personal Data secure. You shall not share Your Personal Data or other security information of Your Account with anyone. We have undertaken reasonable measures to protect Your rights of privacy concerning Your usage of the Website controlled by Us and Our Services. However, We shall not be liable for any unauthorized or unlawful disclosures of Your Personal Data made by any third-parties who are not subject to Our control. In the event of any actual or suspected security incidents, including data breaches, We will take all measures required to be undertaken under applicable laws.

If You have any questions about the security or retention of Your Personal Data, You can contact Us at dpo@excelra.com.

How to contact Us

Submission of Rights Requests: You may exercise Your rights, by contacting Our Data Protection Officer (“DPO”) at dpo@excelra.com

If you have any privacy-related questions, concerns or complaints about Our Privacy Policy, Our practices or Our Services, You may contact Our DPO by email at dpo@excelra.com with minimum requirements mentioned below

Required Information:

- Full name and contact details
- Description of the grievance or rights You wish to exercise
- Sufficient information to enable Us to identify the Personal Data and verify Your identity

We may also ask you to provide:

- Relevant dates and events
- Any supporting documents

Upon receipt of a grievance:

- Excelra will acknowledge the grievance within two (2) business days, providing a unique reference number and details for further communication.
- The grievance will be investigated and assessed by the DPO in coordination with relevant internal teams, as required.
- Excelra will endeavour to resolve the grievance within seven (7) business days from acknowledgment. Where the grievance involves complex or cross-functional issues, this timeline may be extended up to fifteen (15) business days, with appropriate communication to the Data Principal.

- The outcome of the investigation, including any actions taken or reasons for rejection or partial acceptance of the grievance, will be communicated in writing to the Data Principal, along with information regarding available escalation options

Escalation Levels

If You are not satisfied with the response or resolution provided:

1. Initial Review: Your grievance will be examined by the DPO.
2. Internal Escalation: Where You remain dissatisfied, the grievance may be escalated internally to a senior designated authority within the Company for further review.
3. External Escalation: Upon exhaustion of internal grievance redressal mechanisms, You have the right to approach the Data Protection Board of India.

The grievance will be investigated in accordance with the Excelra Grievance Redressal Procedure. In the alternative, You may contact Us by either of the following means:

Grievance Officer (India): Contact dpo@excelra.com. Resolution timeline: 7–15 days.

By Mail: Attn: Data Protection Officer

Excelra Knowledge Solutions Private Limited

7th Floor |Wing B |NSL SEZ Arena |Plot # 6 | Survey # 1 | IDA Uppal | Hyderabad-500039

☎ +91 40 6707-3333 -> 3322

We put Our best efforts to resolve Your grievance in a fair, equitable and timely manner, in compliance with applicable laws.

By lodging a complaint, You agree to provide complete support to the grievance redressal officer and such reasonable information as may be sought from You. We aim to resolve the complaints as soon as possible.

If You have exhausted Your opportunity of redressing Your grievances concerning Your Personal Data with Us and You are not satisfied with the resolution, You may raise Your concern to the Higher Authority under applicable law/Data Protection Board of India, once formed and effective.

While You have the right to raise complaints with both the Company and the Higher Authority/Data Protection Board of India, please note that, registering false or frivolous complaints with the Higher Authority/Data Protection Board is a punishable offence.

Complaints subject to the GDPR

To the extent that the GDPR applies, You can make a complaint to an EU data protection authority or the UK data protection authority (as applicable), in particular in particular in the member state/country of your residence, your place of work or the place of the alleged infringement. However, We would welcome the opportunity. to resolve the matter in the first instance. You can contact Us for this purpose at: dpo@excelra.com

In Belgium the Autorité de la protection des données, Rue de la Presse, 35, 1000 Bruxelles, contact@apd-gba.be, www.autoriteprotectiondonnees.be is the competent authority.

In the Netherlands the Autoriteit Persoonsgegevens, Hoge Nieuwstraat 8, 2514 EL The Hague, www.autoriteitpersoonsgegevens.nl is the competent authority.

In the UK the Information Commissioner's Office (ICO) Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF is the competent authority.

ICO helpline number: 0303 123 1113

<https://ico.org.uk/global/contact-us/contact-us-public/>

Changes to this Privacy Policy

We reserve the right to amend this Privacy Policy from time to time to ensure that this Privacy Policy is consistent with any developments to the Website and Services, the way We use Your Personal Data and any changes to the applicable laws including applicable data protection laws. We will make the updated Privacy Policy available on the Website. We will notify You of any changes to this Privacy Policy by way of an email or by way of a pop-up or notification on the Website or any other means as may be permitted under applicable laws. You will be required to acknowledge the updated Privacy Policy before You can continue accessing the Website and the Services after such change. We encourage You to visit the Website from time to time to ensure that You are well informed about Our latest policies concerning Personal Data protection. All communications, transactions and dealings on the Website shall be subject to the latest version of this Privacy Policy in force at the time.

You should review this Privacy Policy regularly for changes. You may also determine if any such revision has occurred by checking the "Last Updated" legend.



Where data means more

excelra

NEW JERSEY • BOSTON • LONDON • GHENT • UTRECHT • HYDERABAD

Connect with our experts: marketing@excelra.com

www.excelra.com

Disclaimer: This communication is intended solely for the recipient. The whole or any part of this communication should not be transmitted to any external entity or enterprise without the express written consent of Excelra. If you have received this communication by mistake, or if you are not the intended recipient, kindly delete it and immediately notify us in writing.