

GREEN AERO PROPULSION PRIVATE LIMITED

PRIVACY POLICY

Version 1.0

Prepared by **Green Aero Propulsion Management**

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GREEN AERO PROPULSION PRIVATE LIMITED

PRIVACY POLICY

Adopted pursuant to the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011

Version 1.0 | Effective Date: 29:08:2023

1. Introduction and Applicability

1.1 Green Aero Propulsion Private Limited, a company incorporated under the Companies Act, 2013 and having its registered office at Bengaluru, Karnataka, India (“Company”, “we”, “us” or “our”), is committed to protecting the privacy and security of the personal information and sensitive personal data or information of its website visitors, customers, vendors, job applicants, employees and other individuals who interact with the Company (“Users” or “you”).

1.2 This Privacy Policy (“Policy”) is published in compliance with Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“SPDI Rules”), framed under Section 43A of the Information Technology Act, 2000 (“IT Act”), and sets out the manner in which the Company collects, receives, possesses, stores, deals with or handles Personal Information and Sensitive Personal Data or Information.

1.3 This Policy is made available on the Company’s website <https://www.greenaero.in/> and is provided for free access to the Users, as required under Rule 4(1) of the SPDI Rules.

1.4 By using the Company’s website, products, platforms, or by otherwise providing personal information to the Company, the User consents to the collection, use, storage, processing and disclosure of information in accordance with this Policy.

2. Definitions

2.1 “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 the Company, is capable of identifying such a person.

2.2 “Sensitive Personal Data or Information” (“SPDI”) means such Personal Information as defined under Rule 3 of the SPDI Rules, consisting of information relating to:

- Passwords;
- Financial information such as bank account, credit card, debit card or other payment instrument details;
- Physical, physiological and mental health condition;
- Sexual orientation;
- Medical records and history;
- Biometric information;
- Any detail relating to the above as provided to the Company and
- Any information received under the above by the Company for processing, stored or processed under lawful contract or otherwise;

provided that any information freely available or accessible in the public domain, or furnished under the Right to Information Act, 2005 or any other law in force, shall not be regarded as SPDI for the purposes of this Policy.

3. Collection of Information

3.1 The Company may collect Personal Information and SPDI directly from Users, including but not limited to the following categories:

- Identity and contact information, such as name, designation, employer, postal address, email address and telephone number;
- Financial information, such as bank account details, GST/PAN details and billing information, collected from vendors, customers and employees for the purpose of payments and statutory compliance;
- Employment-related information, including resumes, educational qualifications, employment history and background verification details, collected from job applicants and employees;

- Technical information such as IP address, browser type, device identifiers and usage data collected through the Company's website and IT systems;
- Any other information voluntarily submitted through forms, correspondence, meetings or in the course of commercial or contractual dealings with the Company.

3.2 The Company collects SPDI only where such collection is for a lawful purpose connected with a function or activity of the Company, and where the collection is considered necessary for that purpose, in accordance with Rule 5(2) of the SPDI Rules.

3.3 Wherever the Company collects SPDI directly from a User, the Company shall, prior to collection, take reasonable steps to ensure that the User is made aware of: (a) the fact that the information is being collected; (b) the purpose for which it is being collected; (c) the intended recipients of the information; and (d) the name and address of the agency collecting and retaining the information, in accordance with Rule 5(3) of the SPDI Rules.

3.4 The Company shall, prior to collection of SPDI, provide the User with the option to not provide the SPDI sought to be collected, in accordance with Rule 5(7) of the SPDI Rules.

4. Consent

4.1 The Company shall obtain consent from the User, through electronic means (including via letter, fax or email), regarding the purpose of use of SPDI before collection of such information, in accordance with Rule 5(1) of the SPDI Rules.

4.2 The user may contact the grievance officer at the contact details specified in the section 9 below for any queries, concerns or clarifications relating to personal data or other information submitted by the user through any forms or collected by the company in the course of recruitment , vendor, investor, supplier during interactions with the company .

4.3 The Company shall not retain SPDI for longer than is required for the purposes for which the information may lawfully be used, or is otherwise required under applicable law.

5. Purpose and Use of Information

5.1 Personal Information and SPDI collected by the Company is used strictly for the purpose for which it was collected, including for the following:

- Performance of contractual obligations with customers, vendors and business partners;
- Processing of employment applications and administration of employment relationships;
- Compliance with statutory, regulatory and export-control obligations applicable to the Company's business, including under the Foreign Trade (Development and Regulation) Act, 1992, SCOMET regulations, and applicable defence procurement and DGCA regulations;
- Financial reporting, tax compliance, and processing of payments;
- Communication with Users regarding products, or updates;
- Improvement of the Company's website, systems, products; and
- Prevention of fraud, unauthorised access, and ensuring the security of the Company's premises, systems and information assets.

5.2 The Company will not use SPDI for any purpose other than the purpose for which it was collected, without obtaining the prior consent of the User.

6. Disclosure of Information

6.1 Disclosure of SPDI to a third party shall require the prior permission of the User, except where such disclosure has been agreed to in the contract between the Company and the User, or where the disclosure is necessary for compliance with a legal obligation, in accordance with Rule 6(1) of the SPDI Rules.

6.2 The Company may disclose Personal Information or SPDI to:

- Group companies, affiliates and business partners, strictly on a need-to-know basis;
- Professional advisors, auditors, and consultants engaged by the Company;
- Government or regulatory authorities, law enforcement agencies, or courts of competent jurisdiction, where required under applicable law, including for national security or investigation of cyber incidents, in accordance with Rule 6(2) of the SPDI Rules;
- Third-party service providers engaged by the Company for the performance of specific functions (such as payroll processing, IT infrastructure, or cloud hosting), subject to contractual confidentiality obligations.

6.3 Any third party or government agency receiving Personal Information or SPDI from the Company shall not further disclose such information to any other third party, in accordance with Rule 6(3) of the SPDI Rules.

6.4 The Company does not sell, trade, or rent Users' Personal Information or SPDI to unaffiliated third parties for marketing purposes.

7. Transfer of Information

The Company may transfer Personal Information and SPDI to any other body corporate or person in India, or located in any other country, that ensures the same level of data protection as provided for under the SPDI Rules, provided that such transfer is necessary for the performance of a lawful contract between the Company and the User, or where the User has consented to such transfer, in accordance with Rule 7 of the SPDI Rules.

8. Reasonable Security Practices and Procedures

8.1 The Company has implemented reasonable security practices and procedures, commensurate with the information assets being protected and the nature of its business, in accordance with Rule 8 of the SPDI Rules. These include documented information security policies and standards, and comprehensive security measures covering managerial, technical, operational and physical safeguards.

8.2 The Company's security practices include, without limitation:

- Access controls restricting access to Personal Information and SPDI to authorised personnel on a need-to-know basis;
- Use of encryption, firewalls and other technical safeguards to protect information in storage and transit;
- Periodic review and audit of information security controls;
- Employee training and confidentiality undertakings regarding handling of Personal Information and SPDI;
- Incident response procedures for identification, reporting and remediation of information security breaches.

8.3 In the event of an information security breach, the Company shall be required to demonstrate, as and when called upon to do so by an agency mandated under applicable law, that it has implemented security control measures in accordance with its documented information security programme and policies.

9. Grievance Redressal

9.1 In accordance with Rule 5(9) of the SPDI Rules, the Company has designated Mr. Farhan Pathan as its Grievance Officer to address any discrepancies or grievances of Users with respect to the processing of information in a time-bound manner.

Grievance officer- Farhan Pathan

Email- farhan.pathan@greenaero.in

Phone Number- 8128563469

Address: Registered office: B1/H3, Mohan Cooperative Industrial Estate, Mathura Road , Block B , Badarpur (South Delhi) , New Delhi
Delhi , 110044.

R&D office: Devanahalli, Bengaluru, Karnataka , 562149

9.2 Users may write to the Grievance Officer for any queries, complaints or requests relating to access, correction, or deletion of their Personal Information or SPDI. The Company shall redress the grievance within one (1) month from the date of receipt of the grievance, or such other timeline as may be prescribed under applicable law.

10. Access and Correction

10.1 Users shall, at their option, be permitted to review the Personal Information and SPDI provided by them and ensure that any information found to be inaccurate or deficient is corrected or amended, to the extent feasible, in accordance with Rule 5(6) of the SPDI Rules.

10.2 The Company shall not be responsible for the authenticity of Personal Information or SPDI supplied by a User to the Company or to any other person.

11. Retention of Information

The Company retains Personal Information and SPDI only for as long as is necessary to fulfil the purposes for which it was collected, or as required to comply with applicable statutory, regulatory, accounting or contractual obligations, after which such information is securely deleted or anonymised.

12. Cookies and Website Usage Data

The Company's website may use cookies and similar tracking technologies to enhance user experience and analyse website traffic. Users may configure their browser settings to refuse cookies; however, this may affect the functionality of certain features of the website.

13. Third-Party Links

The Company's website may contain links to third-party websites. This Policy does not apply to such third-party websites, and the Company is not responsible for the privacy practices or content of any linked websites. Users are encouraged to review the privacy policies of any third-party websites they visit.

14. Changes to this Policy

The Company reserves the right to update or amend this Policy at any time to reflect changes in its information practices or to comply with changes in applicable law. Any material changes to this Policy will be posted on the Company's website with a revised effective date. Users are encouraged to review this Policy periodically.

15. Governing Law and Jurisdiction

This Policy shall be governed by and construed in accordance with the laws of India, including the Information Technology Act, 2000 and the rules made thereunder. Courts at Bengaluru, Karnataka or New Delhi shall have exclusive jurisdiction over any disputes arising out of or in connection with this Policy.

16. Contact Us

For any questions regarding this Policy or the Company's information handling practices, Users may contact the Grievance Officer at the details provided in Section 9 above.

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