



PANTHER NAILS

PANTHER NAILS CLOUD INFRASTRUCTURE, INTEGRATIONS & SUB PROCESSORS

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Provision for Exception	These provisions apply to all domain clients unless an exception is formally requested and approved. Exceptions should be requested through the Panther Nails Agreements Exception Process and are subject to approval by Executive Management.

CONTENTS

CONTENTS

- Legends 3
- Cloud Infrastructures & Integrations..... 3
 - High Availability 4
 - Application And Cloud Security..... 4
 - Architecture 5
 - Segregation Principle..... 5
 - Data Protection 5
- Panther Nails Sub Processors 6
 - What is a Sub-processor? 6
 - Due Diligence..... 6
 - Contractual Safeguards..... 6
 - Process to Engage New Sub-processors 7
 - Infrastructure Sub-processors - Service Data Storage and Processing 9
 - Service Specific Sub-processors 10

LEGENDS

1. Company – Panther Nails Technologies Pvt Ltd
2. Subscriber / Business – Panther Nails' customer who has purchased the SaaS subscription.
3. User – users who are using the Panther Nails' Applications as per the rights given by the business.
4. Data – Collectively "User Personal Data" And "User Business Data"

CLOUD INFRASTRUCTURES & INTEGRATIONS

1. Panther Nails Featured (i.e., HRMS / TEM / SCM / SAM – Loyalty App etc.) is a module of
 - a. Panther Nails One App
 - b. Panther Nails Rasik Appand it has been built on Panther Nails' proprietary After8 Framework.
2. The application platform is deployed on Microsoft Azure Cloud cluster. (Region: India)
3. The application acts as a SaaS Model and the mobile apps are published on Google Play Store and Apple AppStore with either Panther Nails Branding App (i.e., One App & Rasik App) or Business Branding App (if opted).
4. The Business can additionally subscribe to Private Business Database Clusters, which will contain Business Data only.
5. Apart from Cloud Infrastructure, following sub-processors account belongs to Panther Nails which acts as a SaaS solution.
 - a. OTP & Transactional SMS
 - b. Email Communication
 - c. Aadhar, Bank, PAN, EPF, GSTIN, Vaccination etc. E-KYC API.
 - d. Paytm wallet and Paytm Bank Account API for Fund Transfers
 - e. IVR based support helpline.
 - f. GPS Location place and distance calculation APIs.
 - g. Microsoft featured sub-processors (Such as Face API / Vision API etc.)
 - h. Content Delivery Network to view documents on Mobile Apps.
 - i. Logistics APIs for Goods delivery.
 - j. WhatsApp APIs
 - k. Notification APIs

HIGH AVAILABILITY

Panther Nails ensures high availability by properly designing and implementing the Application Platform. When designing the solution architecture, we make sure that appropriate architecture, hardware, software, and services are used. During the design phase we also need to understand what kind of load and growth the business is expecting. Solution architecture is then tailored to the business's needs, and it ensures best possible performance and high availability. This is achieved by having appropriate number of properly sized servers.

Panther Nails handles Microsoft Azure critical servicing tasks, such as patching, backups, Windows, and SQL upgrades, as well as unplanned events such as underlying hardware, software, or network failures. Azure SQL Database can quickly recover even in the most critical circumstances ensuring that your data is always available. Panther Nails Cloud utilizes an availability model that is based on a separation of compute and storage resources. (Applicable to Private Business Database Clusters Only).

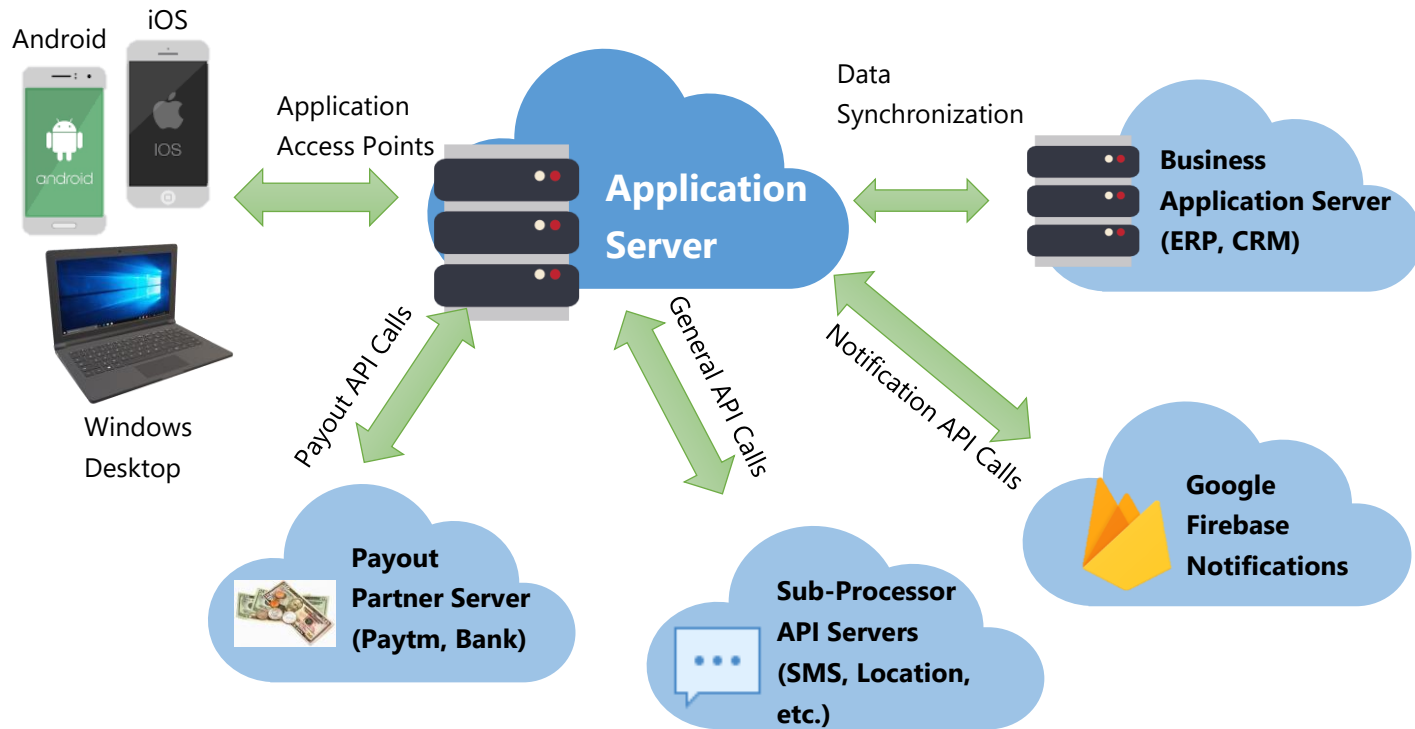
The high availability solution is designed to ensure that committed data is never lost due to failures, that maintenance operations do not affect your workload, and that the database is not a single point of failure in software architecture. There can be maintenance windows or downtimes that should require business to stop the workload while the database (or any other part of the Panther Nails Cloud) is upgraded or maintained. These Activities are usually carried out in late hours where business impact is minimal. The maintenance windows are usually followed by hyper-care period which last for 8 to 24 hours depending upon the criticality of the task.

APPLICATION AND CLOUD SECURITY

There are two types of securities offered with the platform.

1. Application-Level Security (Included in Platform Cost)
2. Basic Cloud Level Security (Included in Platform Cost)
3. Advanced Cloud Level Security (Additional Charges are Applicable).

ARCHITECTURE



SEGREGATION PRINCIPLE

All the data stored on the cloud infrastructure is segregated with each subscriber using subscriber identification. The subscriber only able to access the data linked with the subscriber ID. With Private Business Database Clusters subscriptions, the data is kept in a separate database cluster.

DATA PROTECTION

The Business data is kept secured form any kind of direct access. The application itself access the data using APIs with proper security credentials. Audit trails are maintained of any data accessed through the application which is available in the application.

All screens of the applications are enriched with the 'Export to Excel' functionality. At the time of cancellation of subscription, The Business can export all the business data and request for its deletion. The system will delete all the business data within 30 days from the data of request.

PANTHER NAILS SUB PROCESSORS

Panther Nails uses certain sub-processors (listed below) and content delivery networks to assist it in providing services over the Panther Nails Platform.

WHAT IS A SUB-PROCESSOR?

A sub-processor is a third-party data processor engaged by Panther Nails, who has or potentially will have access to or process Data. Panther Nails engages diverse types of sub-processors to perform various functions as explained in the section [Service Specific Sub-Processors](#).

DUE DILIGENCE

Panther Nails undertakes to use a commercially reasonable selection process by which it evaluates the security, privacy and confidentiality practices of proposed sub-processors that will or may have access to or otherwise process data.

CONTRACTUAL SAFEGUARDS

Panther Nails requires its sub-processors to satisfy equivalent obligations as those required from Panther Nails (as a Data Processor) as set forth in Panther Nails Data Processing Agreement (“DPA”), including but not limited to the requirements to:

- Process Personal Data in accordance with data controller’s (i.e., Subscriber’s) documented instructions (as communicated in writing to the relevant sub-processor by Panther Nails).
- In connection with their sub-processing activities, use only personnel who are dependable and subject to a contractually binding obligation to observe data privacy and security, to the extent applicable, pursuant to applicable data protection laws.
- Provide regular training in security and data protection to personnel to whom they grant access to Personal Data.
- Implement and maintain appropriate technical and organizational measures (including measures consistent with those to which Panther Nails is contractually committed to adhere to insofar as they are equally relevant to the sub-processor’s processing of Personal - Data on Panther Nails’ behalf and provide an

annual certification that evidence compliance with this obligation. In the absence of such certification, Panther Nails reserves the right to audit the sub-processor.

- Promptly inform Panther Nails about any actual or potential security breach; and Cooperate with Panther Nails to deal with requests from data controllers, data subjects, or data protection authorities, as applicable.
- The sub processor may stop or suspend the service due to violation of rules / policy made by sub processor or because of government restrictions. In such case, we are committed to resume the services as soon as possible. The downtime shall not fall under the penalties of service down.
- In such scenario, the RCA will be provided when we will receive it from the sub-processor provider.

Third-party service providers which incidentally have access to Business Data in Innovation Services and are used to provide specific features or components of the product outside of the core hosting of Service Data (“Innovation Service Specific sub-processors”) are regularly reviewed by Panther Nails to ensure they work towards implementing each of the standards described in this Section. However, Innovation Service Specific sub-processors may not currently meet all the measures identified above.

This policy does not give Subscribers any additional rights or remedies and should not be construed as a binding agreement. The information herein is only provided to illustrate Panther Nails’ engagement process for sub-processors as well as to provide the actual list of third-party sub-processors and content delivery networks used by Panther Nails as of the date of this policy (which Panther Nails may use in the delivery and support of its Services).

If you are a Panther Nails Subscriber and wish to enter our DPA, please email us at legal@panthernails.com

PROCESS TO ENGAGE NEW SUB-PROCESSORS

For all Subscribers who have executed Panther Nails’ standard DPA, Panther Nails will provide notice via this policy of updates to the list of sub-processors that are utilized, or which Panther Nails proposes to utilize to deliver its Services. Panther Nails undertakes

to keep this list updated regularly to enable its business / subscribers to stay informed of the scope of sub-processing associated with the Panther Nails Services.

Pursuant to the DPA, a client may object in writing to the processing of its Personal Data by a new sub processor within thirty (30) days following the update of this policy and such objection shall describe Subscriber's legitimate reason(s) for objection. If a client does not object during such time period, the new sub-processor(s) shall be deemed accepted.

If a Subscriber objects to the use of a new sub-processor pursuant to the process provided under the DPA, Panther Nails shall have the right to cure the objection through one of the following options (to be selected at Panther Nails' sole discretion):

- (a) Panther Nails will cease to use the new sub-processor with regarding to Personal Data.
- (b) Panther Nails will take the corrective steps requested by Subscriber in its objection (which steps will be deemed to resolve Subscriber's objection) and proceed to use the sub-processor to process Personal Data; or
- (c) Panther Nails may cease to provide, or Subscriber may agree not to use (temporarily or permanently) the aspect of a Panther Nails Service that would involve use of the sub-processor to process Personal Data.

Termination rights, as applicable and agreed, are set forth exclusively in the DPA.

The following is an up-to-date list (as of the date of this policy) of the names and locations of Panther Nails sub-processors and content delivery networks:

INFRASTRUCTURE SUB-PROCESSORS - SERVICE DATA STORAGE AND PROCESSING

Panther Nails owns or controls access to the infrastructure that Panther Nails uses to host and process Service Data submitted to the Services, other than as set forth herein. Currently, the Panther Nails production systems used for hosting Service Data for the Services are in co-location facilities in India and other countries and in the infrastructure sub-processors listed below. Subscriber accounts are typically established in one of these regions based on where the Subscriber is located but may be shifted among locations to ensure performance and availability of the Services. The following table describes the countries and legal entities engaged by Panther Nails in the storage of Service Data. Panther Nails also uses additional services provided by these sub-processors to process Service Data as needed to provide the Services. Infrastructure sub processors do not have control of business data and Panther Nails owns and manages data within the service providers infrastructure. In case of datacenter failure Panther Nails ensures data availability within geographies agreed between business and Panther Nails.

Entity Name	Entity Type	Entity Country
Microsoft India Private Limited	Azure Cloud Service Provider	India
ESDS Software Solution Limited	eNlight Cloud Service Provider	India

SERVICE SPECIFIC SUB-PROCESSORS

Panther Nails works with certain third parties to provide specific functionality within the Services. These providers are the sub-processors set forth below. To provide the relevant functionality these sub processors access Service Data. Their use is limited to the indicated Services. If Subscriber has purchased the Panther Nails SaaS app, the sub-processors used for the Suites will be in accordance with the sub processors listed for the underlying Services that make up the Panther Nails SaaS app as applicable and detailed in this policy.

Entity Name	Purpose	Entity Country	Access to User Data	Data Access Details
Microsoft Corporation	Panther Nails uses Microsoft Office 365 for email services. O365 infrastructure processes some Panther Nails email traffic and provides some email security services.	United States.	Yes	Email ID and Email Content Shared While Sending Email
Google Play Store	Panther Nails uses Play Store platform to host the android application.	United States	Yes	Users' application downloads and usage information
Apple AppStore	Panther Nails uses Apple AppStore platform to host the iOS application	United States.	Yes	Users' application downloads and usage information
PRP SMS	SMS API	India	Yes	Mobile Number is Shared While Sending SMS

Google APIS	Place Finding Distance Finding Map Drawing	United States.	No	GPS Position Latitude and Longitude are Shared While Fetching Details
Google Firebase APIs	App Notifications	United States.	No	Firestore generated GUID on each Customer Mobile Device which is use for receiving notifications
Microsoft API	Face API	India	Yes	User Face Data Point Stores in Microsoft. Actual User Image Not Retained in Microsoft Face API
Sure Pass API	Aadhar Verification PAN Verification Bank Account Verification	India	Yes	User Document Numbers are Shared on Verification
Paytm Payment Bank	Fund Transfer in Bank	India	Yes	Bank Account Number, Bank Account Name and IFSC Code are Shared on Fund Transfer
One 97 Communication	Fund Transfer in Paytm Wallet	India	Yes	Mobile No shared for Fund Transfer
Cashfree Payments India Pvt Ltd	Fund Transfer in Bank	India	Yes	Bank Account Number, Bank Account Name and IFSC Code are Shared on Fund Transfer

Axis Bank	Fund Transfer in Bank	India	Yes	Bank Account Number, Bank Account Name and IFSC Code are Shared on Fund Transfer
Delhivery	Logistics API Used for Goods Dispatch to End User	India	Yes	Customer Name, Mobile No, Address are Shared on Fund Transfer
360 Dialogs	WhatsApp API Use for Support Communication	USA	Yes	Mobile No is Shared on Sending Multimedia Messages
Exotel Techcom Private Limited	IVR Telephonic Support	India	Yes	Incoming Call Number Shared with Exotel and Call Recording Stored on Exotel Infra.

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