



# ***PANTHER NAILS***

## APPLICATION DATA PRIVACY

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| <b>Provision for Exception</b> | 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. |

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## LEGENDS

1. Company – Panther Nails Technologies Pvt Ltd
2. 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" And "Business Data"

## BUILDING TRUST FROM DAY 1

At Panther Nails our utmost job is protecting **Business's Valuable Customer Data**. Data Privacy is a major aspect in our work routine. We train our employees for this with various induction program, and this has been conducted with due diligence.

The access to Business' data is **restricted to only support team members** that too when customer or a business user has raised any query. In that scenario as well, the system shows only the part of data specific to the concern. We have a call recording system for incoming calls. Our in-app help ticket system access data when customer or a business user share 4-digit code to us for a defined timeframe.

With our Cloud Infrastructure setup, the system shows business data through a single façade with proper **login credentials enabled with SSO logins**. This ensures that the data is being accessed of the requested business / subscriber only. This applies for our backend team as well. Business will access all enterprise level audit trails from application itself on regular basis.

## PANTHER NAILS DATA PRIVACY

Businesses use our services to manage their work. Panther Nails processes user "business data" and "personal data" in these services only according to the business' instructions.

## DATA WE COLLECT

As a user of the application, the user may choose to provide us their "personal data" such as:

- Mobile Number
- First Name
- Last Name
- Profile Pic
- Email address
- Birthday

- Anniversary
- Addresses
- Bank Details
- Personal Identification Documents (Aadhar, PAN, GSTIN, etc.)
- Etc.

User or Business stores additional “business data” such as

- User category
- Financial Transaction
- Work Profile
- GPS logs

for account management purposes related to the use of Panther Nails software-as-a-service applications.

Panther Nails may use some tracking technologies to observe the user activities, interactions, GPS locations, and other information (such as device details) relating to the use of the application and services. We may also use log files, and similar technologies to collect information about the application screens visited, actions performed, banners and links clicked, and any other action taken by the user when accessing the application.

## HOW PANTHER NAILS USE USER DATA

### **1. To Contact Business**

Panther Nails uses the data collected about Business to provide Panther Nails applications, services, and support. For example, if you provide data to us with a query, we will use our data to respond to the request.

### **2. To Contact Business Users**

Panther Nails uses the data collected about business user to provide Panther Nails applications, services, and support. For example, if business user has provided data to us with a query, we will use our data to respond to the request.

### **3. For Improvement Purposes**

Panther Nails uses the data collected to understand how our applications and services are being used and to make improvements.

### **4. For Security and Investigations**

Panther Nails may use user information to diagnose technical problems, as well as to prevent, detect, mitigate, and investigate potential security issues, as well as fraudulent or illegal activities.

## DISCLOSURE OF DATA

### **1. Affiliates and Service Providers**

Panther Nails may share data with Panther Nails Affiliates and third-party service providers, or vendors within contract to provide services on our behalf. These third-party service providers or vendors may use data provided to them only as instructed by Panther Nails.

### **2. Additional disclosures**

Panther Nails may disclose data if we have a good faith or belief that such action is necessary to (a) conform to legal requirements or comply with legal processes; (b) protect and defend our rights and property; (c) enforce the application terms and conditions; and /or (d) act to protect the interests of our users or others.

If in case, Panther Nails goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, business user's personal data may be among the assets transferred.

Panther Nails does not sell business "user personal data" and "user business data" that has been collected or processed under this application.

### **3. International Data Transfers**

In future, Panther Nails will operate as a global business and may transfer, store, or process data in a country outside your authority, including countries outside the European Economic Area ("EEA"). However, we have taken appropriate safeguard with respect to the protection of your privacy, fundamental rights, and freedoms, and the exercise of your rights.

### **4. Data Retention**

Panther Nails will retain data at least if necessary to fulfil the service that you have requested, comply with any laws or regulations, resolve disputes, and enforce our agreements. Panther Nails may retain your data longer for a legitimate business interest where business benefit is not outweighed by your personal rights and freedoms. Data entered in Panther Nails application is retained in accordance with any applicable agreement between Panther Nails and the Business.

### **5. User Personal Data Storage Policy**

If the user is already registered on Panther Nails Platform, then user personal data which is cross-verified and provided by the sub-processors, will be automatically populated for the new business user only while entering or creating new user information under the centralized storage of user owned personal data to avoid duplicate copies of user personal data over the Panther Nails Cloud Infrastructure. This information will always be retained over the Panther nails cloud infrastructure even after cancellation of the subscription by the business.

## BUSINESS'S RIGHTS OVER THE DATA

Depending on where business is located, business may have certain legal rights over the data we hold about business users, subject to local privacy laws. These may include the rights to:

- Access the "personal data" and "business data" company hold about business users.
- Have incorrect data updated or deleted.
- Have user's data deleted.
- Restrict the processing of the user's business data only.
- Object to the processing of user's business data carried out based on our legitimate interests or for direct marketing purposes.
- Receive a copy of your user's business data in an electronic and machine-readable format.
- Receive the categories of sources from whom Company collected user's personal data.
- opt out of marketing communications at any time by clicking on the "Unsubscribe" or "opt out" link in marketing emails company send to the user or by user contacting the company.
- Complaint to a regulator or data protection authority about Company's collection and use of user's business data.

Panther Nails will not discriminate against you for exercising your rights.