

REPUT

This **Privacy Notice** describes the information Upcycle reput techpvt ltd. (“**REPUT**”, “**we**”, “**our**”, or “**us**”) collects, how we use and retain this information, with whom we share it, and the choices you have in connection with these activities. This Privacy Notice applies to the REPUT’s website (REPUT.ai) (the “**Website**”) and our Software as a Service and web-based technologies and solution (“**Platform**”) owned and controlled by REPUT (collectively, our “**Services**”).

1. Our Role in data processing

For residents of the India, the entity responsible for the collection and use (processing) of your personal data is REPUT, You can contact REPUT’s Data Protection Officer by email at team@reput.com, or mail in the 399/324/1/B/Plot No. 5-M/B, Jigani Industrial Road, Jigani Industrial area phase 1, Bangalore 562106. Under the **GDPR**, REPUT is Data Controller in relation to its processing of personal data through the Platform and the Website. As used in this Privacy Notice, the term “personal information” includes the term “personal data” as defined under GDPR law.

2. Personal information we collect, how we use it, how long we keep it, and how we share it

When you interact with our Services, we collect your personal information. Personal information is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual.

A. When you use our Enterprise Platform, we will collect your personal information when you:

- **Register for the Platform.** When you create an account in the Platform, we will collect your registration information, which includes your identifiers (name, business email address, and business telephone number, business address, and selected password), employment information (employer name, job title). We will use this information to create your account, authenticate you to your account, and communicate with you about the information you upload in your account. If you are a supplier of our customer, we share this information with our customer. To the extent GDPR law applies, the legal basis of this processing is necessary for the performance of the contract with the customer.
- **Log In to your account.** When you log in to your account, we will collect from you your identifiers (email address and password). We will use this information to authenticate you to your account. To the extent GDPR law applies, the legal basis of this processing is necessary for the performance of the contract with you.

B. When you interact with our Website as a representative/employee of a current or prospective customer, we collect your personal information when you:

- Subscribe to our Mailing List.** When you subscribe to our mailing list, we collect your personal identifiers (name, email address, contact type) and your notification preferences. We use this personal information to fulfill your request to receive email alerts with our company press releases. We keep this information for as long as you want to receive email marketing communications from us, or 10 days after you opt-out of marketing emails from REPUT, or earlier if we have received a request to delete this information, unless an exception applies. We will share your identifiers (name and email address) with our email marketing provider to send you the marketing emails. To the extent GDPR law applies, the legal basis for processing this information is consent. You can unsubscribe at any time by clicking on the “unsubscribe” link in each email. Please note that we will continue to send you notifications necessary to the Services or requested products or services. Our communications contain tracking technologies, to analyze whether a predefined action took place by a recipient, such as opening our communications, in order to better adapt and distribute our communications. When you opt-in to our marketing communications, for residents within the India, you will be provided a prompt to allow you to opt-in to the use of these technologies. You can disable tracking by disabling the display of images by default in your email program. To the extent GDPR law applies, the legal basis for this is your consent.
- Download Materials.** When you download materials from our Website, we collect your identifiers (name, business email address, business telephone number (if provided), and employer information (company name and URL). We use this information to provide the downloadable content. We will retain this information for as long as we consider you a prospective customer, or 10 days after you opt-out of marketing emails from REPUT, unless we have received a request to delete this information (and no exceptions apply). To the extent GDPR law applies, the legal basis for this processing of your personal information is to perform a potential contract with you, and the legal basis to send you marketing emails is your consent. We will share your identifiers (name and email address) with our email marketing provider to send you marketing emails.
- Automatic Data Collection.** In addition to the personal information you provide directly to us, we also collect information automatically as you use our Website. We use essential, functional, analytics, and advertising cookies to collect your internet or other electronic network activity information (device, usage, location information (determined through your IP address), such as your browsing history, configuration, unique online identifiers, and interactions with our ads on third-party websites), when you interact with the Services. We use this information to: (i) track you within the Services; (ii) enhance user experience; (iii) conduct analytics to improve the Services; (iv) prevent fraudulent use of the Services; (v) diagnose and repair Services errors, and, in cases of abuse, track and mitigate the abuse; and (vi) market to you more effectively across different web pages and social media platforms.
- Particular third-party cookies to note on our Website include:**

- **Google Analytics.** We use Google Analytics to collect information on your use of our Website to improve our Website. In order to collect this information, Google Analytics may set cookies on your browser, or read cookies that are already there. Google Analytics may also receive information about you from applications you have downloaded that partner with Google. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to our Website is restricted by the Google Analytics [Terms of Use and Privacy Policy](#). Generally, to prevent your data from being used by Google Analytics, you can download the Google Analytics [opt-out browser add-on](#).
- **LinkedIn.** We use LinkedIn Insights Tag for target advertising based on what's relevant to a user, to track conversions, improve reporting on campaign performance and to avoid showing ads the user has already seen. You are not able to opt out of ads on LinkedIn, but you can opt out of retargeting [here](#), or generally manage your Ad settings [here](#).
- **YouTube.** We use YouTube (owned by Google) as our video platform to embed content from YouTube on our website. YouTube uses these cookies to track viewing statistics and assign a unique identifier to the device on which the video is viewed, enabling YouTube to recognize the device. This data is collected by Google. Google can use this data to show relevant advertising and for its own promotional purposes in accordance with Google's [Privacy Policy](#). The Google cookies also allow YouTube and its partners to show you advertisements on and outside of YouTube. To opt-out of this sharing and displaying of YouTube ads, visit Your data in YouTube, where you can clear and control the information YouTube collects on you. If you do not have a Google account, you can opt-out of YouTube ads through the Digital Advertising Alliance (DAA) and its [AdChoices program](#).
- **Engage us to provide the Platform.** When you engage us to subscribe to the Platform on behalf of your employer, our customer, we will collect from you your identifiers (customer representative name, business email address, business address, business telephone number). We will use this information to communicate with you about the services we can provide and to conduct business with you. To the extent GDPR law applies, the legal basis for this processing is to perform a contract with you. We retain this information for the term of the subscription plan for the Platform or until we have received a request to delete this information, unless an exception applies.
- **Contact us with an inquiry.**
 - When you contact us or submit an inquiry by email, we collect your personal identifier (name and business email address, account number) and any other information you choose to include in your correspondence. We use this personal information to respond to your questions or inquiries, troubleshoot

as necessary, and address any issues you have with our Services. We will share this personal information with our third-party customer service provider to assist us with handling customer service requests and our customer relationship management platform provider. Our communications will be shared with our e-mail communications provider to facilitate our assistance and communication with you. We retain this information for the term of your subscription plan with us or until we have received an instruction to delete this information, unless an exception applies. To the extent GDPR law applies, the legal basis for this processing is to perform a contract with you.

- When you call to speak with our customer service representatives, with your consent, we may record the telephone call and collect your identifiers (name, business email address, telephone number), auditory information (recording of your voice), and any information you provide during the call. To the extent GDPR law applies, the legal basis for this processing is your consent. We will retain this information for as long as it is relevant to your account or our training program with us or until we have received a request to delete this information, unless an exception applies.
- When you instant message with a customer service representative, we will collect your identifiers (name, telephone number, business email address), and any other information you include in your communications with us. We will share this personal information with our third-party customer service provider to assist us with handling customer service requests. To the extent GDPR law applies, the legal basis for this processing is to perform a contract with you. We will retain this information for the term of your subscription plan with us, or until we have received a request to delete this information, unless an exception applies.
- **Request a Demo.** When you request a demo on our Website, we will collect from you your identifiers (name; business email address, company name, business telephone number), country, employment information (job title), and how you heard about us. We will use this information to contact you about arranging a demonstration of our Platform. We will retain this information for as long as we consider you a prospective customer, or 10 days after you opt-out of marketing emails from REPUT, unless we have received a request to delete this information (and no exceptions apply). To the extent GDPR law applies, the legal basis for this processing to arrange the demonstration is to perform a potential contract with you, and the legal basis to send you marketing emails is your consent. We will share your identifiers (name and email address) with our email marketing provider to send you marketing emails.
- **Aggregate data.** We aggregate the data we collect for benchmarking purposes and for internal analytics and to improve the Services.

3. how we share your personal information

General Sharing

REPUT shares personal information in the following instances:

- **Within REPUT.** We share your personal information within REPUT for the legitimate business purposes of efficiently and effectively providing the Services, such as accounting and customer service support. Access to your personal information is limited to those on a need-to-know basis. To the extent GDPR law applies, the legal basis for this is our legitimate interest in providing the Services more efficiently.
- **With service providers.** We share personal information with service providers that assist us in providing the Services. These service providers are described more specifically in the **PERSONAL INFORMATION WE COLLECT, HOW WE USE IT, HOW LONG WE KEEP IT, AND HOW WE SHARE IT** section of this Notice.
- **In the event of a corporate reorganization.** In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, acquisition, sale, joint venture, assignment, consolidation, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we would share personal information with third parties, including the buyer or target (and their agents and advisors) for the purpose of facilitating and completing the transaction. We would also share personal information with third parties if we undergo bankruptcy or liquidation, in the course of such proceedings. To the extent GDPR law applies, the legal basis for this is our legitimate interest in carrying out our business operations or, if required by law, consent.
- **For legal purposes.** We will share your personal information where we are legally required to do so, such as in response to court orders, law enforcement or legal process, including for national security purposes; to establish, protect, or exercise our legal rights, as required to enforce our terms of service or other contracts; to defend against legal claims or demands; to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person; or to comply with the requirements of any applicable law. To the extent GDPR law applies, the legal basis for this is compliance with legal obligations or our legitimate interest in compliance with other laws that apply to us.
- **With our Customer.** We will share your personal information with our customer if you sign up for the Platform through our customer. We share this information to provide the Platform to our customer. We will make your personal information available to our customer in accordance with the agreement with our customer. To the extent GDPR law applies, the legal basis for this is for the performance of the contract with our customer.
- **With your consent.** Apart from the reasons identified above, we may request your permission to share your personal information for a specific purpose. We will notify you and request consent before you provide the personal information or before the

personal information you have already provided is shared for such purpose. You may revoke your consent at any time.

REPUT may also share anonymized and aggregated data ("De-Identified Information") in marketing materials. REPUT may also use De-Identified Information for commercial collaborations with companies for purposes such as product design or enhancement of programs we provide.

4. general information choices

You have the following choices with respect to your personal information:

- **Correct or view your personal information.** You may access your REPUT account profile to correct or view certain personal information of yours in our possession and which is associated with your profile.
- **Opt-out of marketing email pixels.** You can disable tracking by disabling the display of images by default in your email program.
- **Opt-out of marketing communications.** You may opt-out of receiving marketing emails from us by clicking the "unsubscribe" link provided with each email. Please note that we will continue to send you emails necessary to the Services or any assistance you request.
- **Opt Out of Other Cookies.** To set your cookie preferences, please navigate to the floating cookie management button on the bottom left corner of the webpage. All session cookies are temporary and expire after you close your web browser. Persistent cookies can be removed by following your web browser's directions. To find out how to see what cookies have been set on your computer or device, and how to reject and delete the cookies, please visit: <https://www.aboutcookies.org/>. Please note that each web browser is different. To find information relating to your browser, visit the browser developer's Website and mobile application. If you reset your web browser to refuse all cookies or to indicate when a cookie is being sent, some features of our website may not function properly. If you choose to opt out, we will place an "opt-out cookie" on your device. The "opt-out cookie" is browser specific and device specific and only lasts until cookies are cleared from your browser or device. The opt-out cookie will not work for essential cookies. If the cookie is removed or deleted, if you upgrade your browser or if you visit us from a different computer, you will need to return and update your preferences. By clicking on the "Opt-Out" links below, you will be directed to the respective third-party website where your computer will be scanned to determine who maintains cookies on you. At that time, you can either choose to opt out of all targeted advertising or you can choose to opt out of targeted advertising by selecting individual companies who maintain a cookie on your machine.
 - Association of National Advertisers opt-out registration:
<https://dmachoice.thedma.org/>

- Network Advertising Initiative (NAI) Opt-Out: https://www.networkadvertising.org/managing/opt_out.asp
- Digital Advertising Alliance (DAA) Opt-Out: <https://optout.aboutads.info>
- European Union (EU) /European Economic Area (EEA) Opt-Out: <http://www.youronlinechoices.eu>

5. Privacy Law Rights

The rights and processes to submit your privacy right request provided below are for any personal information we process for our own purposes (i.e., our business-to-business relationship with your employer or business partner).

RIGHTS OF INDIVIDUALS IN INDIA

Data Subjects in INDIA are entitled to certain rights under the General Data Protection Regulation (“GDPR”). If our processing of your personal information is subject to the GDPR, you may be entitled to the following rights:

- **Right to access.** When the legal basis for us to process your personal information is consent, performance of a contract, legal obligation, or legitimate interest, you have the right to ask us for copies of your personal information. This right has some exemptions, which means you may not always receive all the personal information we process.
- **Right to rectification.** When the legal basis for us to process your personal information is consent, performance of a contract, legal obligation, or legitimate interest, you have the right to ask us to rectify personal information you think is inaccurate or incomplete.
- **Right to erasure.** When the legal basis for us to process your personal information is consent, to performance of a contract, or legitimate interest, you have the right to ask us to erase your personal information in certain circumstances.
- **Right to restrict processing.** When the legal basis for us to process your personal information is consent, performance of a contract, legal obligation, or legitimate interest, you have the right to ask us to restrict the processing of your personal information in certain circumstances. This means you can limit the way that we use your personal information. You have the right to restrict processing when (1) you contest the accuracy of your personal information and we are verifying the accuracy of the personal information; (2) the personal information has been unlawfully processed and you oppose erasure and request certain restriction instead; (3) we no longer need the personal information but you need us to keep it in order to establish, exercise or defend a legal claim; or (4) you have objected to us processing your personal information data protection law, and we are considering whether our legitimate grounds override yours.

- **Right to object to processing.** When the legal basis for us to process your personal information is legitimate interest, you have the right to object at any time, for reasons arising from your particular situation, to processing of your personal information, which is carried out on the basis of our legitimate interests. When the legal basis for us to process your personal information is your consent, you can withdraw your consent.
- **Right to data portability.** When the legal basis for us to process your personal information is your consent or performance of a contract, you have the right to ask that we transfer the personal information you gave us from one organization to another, or give it to you. Please note this only applies to personal information you have given us.
- **Right to lodge a complaint.** You have the right to lodge a complaint with the relevant Supervisory Authority. You can always submit a complaint directly to your local data protection authority.

To exercise these rights, please contact us at team@reput.ai.

6. Do not track

We do not recognize “Do Not Track” requests for internet browsers. Do Not Track is a preference you can set to inform websites and applications that you do not want to be tracked.

7. security of your personal information

We implement and maintain reasonable security measures to protect the personal information we collect and maintain from unauthorized access, destruction, use, modification, or disclosure. These security measures include encryption and access controls. However, no security measure or modality of data transmission over the Internet is 100% secure and we are unable to guarantee the absolute security of the personal information we have collected from you.

8. Age restriction

The Services are not intended for individuals under the age of sixteen (16). If we learn that we have collected or received personal information from a child under the age of sixteen (16), we will delete that information. If you believe we might have information from or about a child under the age of sixteen (16), please contact us at team@reput.ai.

9. Cross border transfer

REPUT’s headquarters are located in the India and store information in the India. We may transfer your personal information to recipients in countries outside of India that may have differing data protection laws. This includes countries which India does not consider to have an adequate level of protection for personal data. If this occurs, we will ensure there is a legal ground for the transfer in accordance with applicable data protection legislation. You will also be informed about the legal ground, what safeguards were implemented, and

where you can obtain a copy of information on these safeguards. REPUT and our client (Controller) have executed a data processing agreement that includes Standard Contractual Clauses that govern the transfer of your personal information outside of India, which we will provide to you upon your request.

10. Changes to this privacy notice

We may amend this Privacy Notice in our sole discretion at any time. If we do, we will post the changes to this page, and will indicate the date the changes go into effect. We encourage you to review our Privacy Notice to stay informed. If we make changes that materially affect your privacy rights, we will notify you by prominent posting on the Website and/or via email, and request your consent, if required.

11. Contact Us

If you have any questions regarding this Privacy Notice, please contact our Data Protection Officer:

By e-mail: team@reput.ai

By mail: 399/324/1/B/Plot No. 5-M/B, Jigani Industrial Road, Jigani Industrial area phase 1, Bangalore 562106

Last modified on December 12, 2024