

Effective: 1st Dec 2023

This Privacy Policy describes how Chattodo collects, uses and discloses information associated with an identified or identifiable individual (referred to in this Privacy Policy as '**Personal Data**') and what choices you have around this activity. If you have any questions, please don't hesitate to contact us.

When we refer to '**Chattodo**', we mean Preseed Ventures P. Ltd. as explained in more detail in the 'Identifying the data controller and processor' section below.

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Applicability of this Privacy Policy

This Privacy Policy applies to Chattodo's online workplace productivity tools and platform, including the associated Chattodo mobile applications (the '**Services**'), <https://chattodo.preseed.in/> and other Chattodo websites (collectively, the '**Websites**') and other interactions (e.g. customer service enquiries, user conferences, etc.) that you may have with Chattodo. If you do not agree with this Privacy Policy, then do not access or use the Services, Websites or any other aspect of Chattodo's business. For the avoidance of doubt, this is the only privacy policy that applies to Chattodo.

This Privacy Policy does not apply to any third-party applications or software that integrate with the Services through the Chattodo platform ('**Third-Party Services**'), or any other third-party products, services or businesses who will provide their services under their own terms of service and privacy policy. In addition, a separate agreement governs delivery, access and use of the Services (the '**Customer Agreement**'), including the processing of data such as messages, files or other content submitted through Services accounts (collectively, '**Customer Data**'). The organisation (e.g. your employer or another entity or person) that entered into the

Customer Agreement (the ‘**Customer**’) controls its instance of the Services (its ‘**Collections**’) and any associated Customer Data. If you have any questions about specific Collections settings and privacy practices, please contact the Customer whose Collections you use. If you have an account, you can check <https://chattodo.preseed.in/> for the contact information of your collections owner(s) and administrator(s). If you have received an invitation to join a Collections but have not yet created an account, you should request assistance from the Customer that sent the invitation.

Indian DPDP Act 2023 Notice of collection of personal information: We collect the information described below under ‘Information we collect and receive’ for the business and commercial purposes described below under ‘Information use’. To learn more about exercising your Indian privacy law, please review the ‘Indian DPDP Act 2023’.

Information we collect and receive

Chattodo will collect and receive information through operating the Services and Websites, and through other interactions with Chattodo. Such information will include Customer Data and other information and data (‘**Other Information**’) in a variety of ways:

- **Customer Data.** Customers or individuals granted access to a Collections by a Customer (‘**Authorised Users**’) routinely submit Customer Data (such as messages, files or other content submitted through Services accounts) to Chattodo when using the Services.
- **Other Information.** Chattodo also collects, generates and/or receives the following categories of Other Information:
 1. **Collections and account information:** To create or update a Collections account, you or our Customer (e.g. your employer) supply Chattodo with an email address, phone number, password, domain and/or other account set-up details (for more detail on Collections creation). In addition, Customers that purchase a paid version of the Services provide Chattodo (or its payment processors) with billing details such as credit card information, banking information and/or a billing address.
 2. **Usage information:**
 - *Services metadata.* When an Authorised User interacts with the Services, metadata is generated that provides additional context about the way that an Authorised User uses the Services. For example, Chattodo logs the Collections, channels, people, features, content and links that you view or interact with, the types of files shared and what Third-Party Services are used (if any).
 - *Log data.* As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use our Websites or Services and record it in log files. This log data may include your Internet

Protocol (IP) address, the address of the web page that you visited before using the Website or Services, browser type and settings, the date and time that the Services were used, information about browser configuration and plugins, and your language preferences.

- *Device information.* Chattodo collects information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and crash data. Whether we collect some or all of this Other Information often depends on the type of device used and its settings.
- *Location information.* We receive information from you, our Customers and other third parties that helps us to approximate your location. We may, for example, use a business address submitted by your employer (who is our Customer) or an IP address received from your browser or device to determine approximate location to assist with localisation or for security purposes.

3. Cookie information: Chattodo uses a variety of cookies and similar technologies in our Websites and Services to help us collect Other Information. For more details about how we use these technologies, and your opt-out controls and other options, please visit our [Cookie policy](#).

4. Third-Party Services information: A Customer can choose to permit or restrict Third-Party Services for its Collections and Chattodo can receive personal data from such Third-Party Services. Typically, Third-Party Services are software that integrate with our Services, and a Customer can permit its Authorised Users to enable and disable these integrations for its Collections (for more details on third-party application management, settings and permissions, [click here](#)). Chattodo may also develop and offer Chattodo applications that connect the Services with a Third-Party Service. Once enabled, the provider of a Third-Party Service may share certain information with Chattodo. For example, if a cloud storage application that you are using is enabled to permit files to be imported to a Collections, we may receive the user name and email address of Authorised Users, along with additional information that the application makes available to Chattodo to facilitate the integration. Authorised Users should check the privacy settings and notices in these Third-Party Services to understand what data may be disclosed to Chattodo. When a Third-Party Service is enabled, Chattodo is authorised to connect and access Other Information made available to Chattodo in accordance with our agreement with the provider of the Third-Party Service and any permission(s) granted by our Customer (including by its Authorised User(s)). Examples of information which Chattodo may receive in this manner include whether you successfully created a new account or interacted with a third-party application in a way that is attributable to Chattodo usage activity. We do not, however, receive or store

passwords for any of these Third-Party Services when connecting them to the Services. For more information on Chattodo's interaction with Third-Party Services.

5. **Contact information:** In accordance with the consent process provided by your device or other third-party API, any contact information that an Authorised User chooses to import (such as importing an address book to find colleagues and Chattodo Connect contacts or calendar from a device or API), forward or upload to the Services (for example, when sending emails to the Services) is collected when using the Services.
6. **Third-party data:** Chattodo may receive data about organisations, industries, lists of companies that are customers, website visitors, marketing campaigns and other matters related to our business from parent corporation(s), affiliates and subsidiaries, our partners or others that we use to make our own information better or more useful. This data may be combined with Other Information that we collect and might include aggregate-level data, such as which IP addresses correspond to postcodes or countries. Or it might be more specific: for example, how well an online marketing or email campaign performed.
7. **Audio and video metadata:** Chattodo may receive, capture and store metadata derived from your use of features such as Chattodo huddles or clips, and additional related data such as data regarding the date and time of your Chattodo huddle and the Authorised User that you connected with.
8. **Additional information provided to Chattodo:** We also receive Other Information when submitted to our Websites or in other ways, such as responses or opinions that you provide if you participate in a focus group, contest, activity or event, feedback that you provide about our products or services, information that you provide if you apply for a job with Chattodo, enrol in a certification programme or other educational programme hosted by Chattodo or a vendor, request support, interact with our social media accounts or otherwise communicate with Chattodo.

Generally, no one is under a statutory or contractual obligation to provide any Customer Data or Other Information (collectively "**Information**"). However, certain Information is collected automatically and if some Information, such as Collections setup details, is not provided, we may be unable to provide the Services.

How we process your information and our legal bases for doing so

Customer Data will be used by Chattodo in accordance with a Customer's instructions, including to provide the Services, any applicable terms in the Customer Agreement, a Customer's use of Services functionality and as required by applicable law. Chattodo is a processor of Customer Data and the Customer is the controller. The Customer may, for example, use the Services to grant and remove access to a

Collections, assign roles and configure settings, access, modify, export, share and remove Customer Data, and otherwise apply its policies to the Services.

Chattodo uses Other Information to operate our Services, Websites and business. More specifically, Chattodo uses Other Information for the following purposes:

Compliance with a legal obligation:

Chattodo processes Other Information when we comply with a legal obligation including, for example, to access, preserve or disclose certain information if there is a valid legal request from a regulator, law enforcement or others. For example, a search warrant or production order from law enforcement to provide information in relation to an investigation, such as your profile picture or IP address.

We use Collections and account information, usage information, cookie information, Third-Party Services information, contact information, third-party data, audio and video metadata, and additional information provided to Chattodo for compliance with a legal obligation.

Legitimate interests:

We rely on our legitimate interests or the legitimate interests of a third party where they are not outweighed by your interests or fundamental rights and freedoms ('legitimate interests').

We use Collections and account information, usage information, cookie information, Third-Party Services information, contact information, third-party data, audio and video metadata, and additional information provided to Chattodo for the following legitimate interests:

- To provide, update, maintain and protect our Services, Websites and business. This includes the use of Other Information to support delivery of the Services under a Customer Agreement, prevent or address service errors, security or technical issues, analyse and monitor usage, trends and other activities, or at an Authorised User's request.
 - It is in our and your interests to provide, update, maintain and protect our Services, Websites and business.
- To develop and provide search, learning and productivity tools and additional features.

Chattodo tries to make the Services as useful as possible for specific Collections and Authorised Users. For example, we may:

- improve search functionality by using Other Information to help determine and rank the relevance of content, channels or expertise to an Authorised User;
- make Services or Third-Party Service suggestions based on historical use and predictive models;
- identify organisational trends and insights;
- customise a Services experience; or
- create new productivity features and products.

- It is in our interest and in the interest of Customers and Authorised Users to continuously improve and develop the customer support that we provide.
- To investigate and help prevent security issues and abuse.
We may use a variety of tools such as device fingerprinting to prevent issues and abuse. We may process, including in an automated fashion, Other Information to better understand how Chattodo is used or to prevent spam or abuse.
 - It is in our interest to keep the Services secure and to detect, prevent and address abuse (such as spam) and to investigate and take action in respect of suspicious activity on the Services.
- To aggregate or de-identify information.
In some cases, we aggregate or de-identify information that we have associated with you and use the resulting information, for example, to improve the Services.
 - It is in our interest to research and improve the Services;
 - It is in the interests of Customers and Authorised Users to practice data minimisation and privacy by design in respect of their information.
- Share information with others, including law enforcement, and to respond to legal requests.
 - It is in our interest and the interest of the general public to prevent and address fraud, unauthorised use of Chattodo, violations of our terms or other harmful or illegal activity; to protect ourselves, our users or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm.
- **Transfer, store or process your information outside the India.**
As the Websites and Services operate globally, with Customers around the world, we need to share information that we collect globally. We carry out necessary transfers outside the India to provide, update, maintain and protect our Services, Websites and business. For more information, review the 'International data transfers' section below.
 - It is in our and your interests to provide, update, maintain and protect our Services, Websites and business.

We use Collections and account information, Third-Party Services information, third-party data and additional information provided to Chattodo for the following legitimate interests:

- To communicate with you by responding to your requests, comments and questions.
If you contact us, we may use your Other Information to respond.
 - It is in our, our Customers' and Authorised Users' interests to facilitate communication (for example to answer questions from Customers).
- To send service emails and other communications.
For example, we may:
 - send you service, technical and other administrative emails, messages and other types of communications; or

- contact you to inform you about changes in our Services, our Services offerings and important Services-related notices, such as security and fraud notices. These communications are considered part of the Services, and you may not opt out of them. It is in our Customers' and Authorised Users' interests to address service-related issues.

We use Collections and account information and usage information for the following legitimate interests:

For billing, account management and other administrative matters.

Chattodo may need to contact you for invoicing, account management and similar reasons and we use account data to administer accounts and keep track of billing and payments.

- It is in our interest to facilitate the effective provision and administration of the Websites and Services.

We use Collections and account information, usage information, cookie information, Third-Party Services information, third-party data and additional information provided to Chattodo for the following legitimate interests:

To send marketing emails and other communications.

We sometimes send emails about new product features, promotional communications or other news about Chattodo. These are marketing messages, so you can control whether you receive them. If you have additional questions about a message that you have received from Chattodo, please get in touch through the contact mechanisms described below.

- It is in our interest to promote the Websites and Services and send our direct marketing.

How we share and disclose information

This section describes how Chattodo may share and disclose Information, as described in the section entitled 'Information we collect and receive' above. Customers determine their own policies and practices for the sharing and disclosure of Information to third parties. Chattodo does not control how a Customer or any third party chooses to share or disclose Information.

- **The Customer's instructions.** Chattodo may share and disclose Information in accordance with a Customer's instructions and with appropriate consent, including any applicable terms in the Customer Agreement and the Customer's use of Services functionality and in compliance with applicable law and legal process. Some sharing at a Customer's request may incur additional fees.
 - To enable Chattodo to follow our Customers' instructions, Chattodo provides several **administrator controls** to allow Customers to manage their Collections. For example, we follow our Customers' instructions

to enable or disable Authorised Users' use of various features of the Services, the sharing and visibility of direct messages including files, or whether and how Authorised Users can connect with other people's collections through Chattodo Connect.

- We also follow Customer and Authorised User instructions on how an Authorised User's profile may be displayed within a **Customer's collections** or when shared through [Chattodo Connect](#) or other features.
- Customers may also provide their Authorised Users with the ability to adjust the audience and visibility of certain Customer Data.
- **Displaying the Services.** When an Authorised User submits Information, it may be displayed or discoverable to other Authorised Users in the same or connected collections or Chattodo Connect instances.
- **Collaborating with others.** The Services provide different ways for Authorised Users working in independent collections to collaborate, such as Chattodo Connect or email interoperability. Information, such as an Authorised User's profile and organisational information, may be shared, subject to the policies and practices of the collection(s) that you use.
- **Customer access.** Owners, administrators, Authorised Users and other Customer representatives and personnel may be able to access, modify or restrict access to Information.
- **Third-party service providers and partners.** We may engage third-party companies or individuals as service providers or business partners to process Information and support our business. These third parties may, for example, provide virtual computing and storage services, assist Chattodo with verifying Owners and Customers, or we may share business information to develop strategic partnerships with Third-Party Service providers to support our common customers. In this respect, depending on the Third-Party Service provided, Chattodo may share your Information. Additional information about the subprocesses.
- **Third-Party Services.** A Customer may enable, or permit Authorised Users to enable, Third-Party Services. We require each Third-Party Service provider to disclose all permissions for information accessible through the Services, but we do not guarantee that they do so. When Third-Party Services are enabled by a Customer or an Authorised User, Chattodo may share Information with Third-Party Services. Third-Party Services are not owned or controlled by Chattodo and third parties that have been granted access to Information may have their own policies and practices for its collection, use and sharing. Please check the permissions, privacy settings and notices for these Third-Party Services, or contact the provider if you have any questions.
- **Forums.** The Information that you choose to provide in a community forum, including personal data, will be publicly available.
- **Organisers and sponsors of events/webinars.** If you attend an event or webinar organised by Chattodo, we may share your profile and organisational information with the event or webinar sponsors when you register, have your badge scanned or join a breakout room. If required by applicable law, you may consent to such sharing via the registration form or by allowing your attendee badge to be scanned at a sponsor booth. In these circumstances, your

information will be subject to the sponsors' privacy statements. For more information, please refer to the terms provided when you register for such an event or webinar.

- **Professional advisers.** We may share your Information with professional advisers acting as service providers, processors, controllers or joint controllers – including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services, and to the extent we are legally obliged to share or have a legitimate interest in sharing your Information containing personal data.
- **Corporate affiliates.** Chattodo may share Information with our corporate affiliates, parents and/or subsidiaries.
- **During a change to Chattodo's business.** If Chattodo engages in a merger, acquisition, bankruptcy, dissolution, reorganisation, sale of some or all of Chattodo's assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities, some or all of the Information described in the 'Information we collect and receive' section may be shared or transferred, subject to standard confidentiality arrangements.
- **Aggregated or deidentified Data.** We may disclose or use aggregated or de-identified Information for any purpose. For example, we may share aggregated or de-identified Information with prospects or partners for business or research.
- **Law enforcement and regulators.** If we receive a request for information, we may disclose Other Information if we reasonably believe that disclosure is in accordance with or required by any applicable law, regulation or legal process.
- **To enforce our rights, prevent fraud and for safety.** To protect and defend the rights, property or safety of Chattodo, its users or third parties, including enforcing its contracts or policies, or in connection with investigating and preventing illegal activity, fraud or security issues, including to prevent death or imminent bodily harm.
- **With consent.** Chattodo may share Information with third parties when we have consent to do so or as otherwise permitted in this Privacy Policy. For Collections registered to corporate entities, Chattodo may share Information with consent of the Collections primary owner or authorised corporate officer, or their designee. For workplaces created without a formal affiliation, Chattodo may require user consent.

Data retention

Chattodo will retain Customer Data in accordance with a Customer's instructions (including to perform any applicable terms in the Customer Agreement and through the Customer's use of Services functionality) and as required by applicable law. The Customer may customise its retention settings and, depending on the Services subscription, apply those customised settings at the collections level, channel level or other level. The Customer may also apply different settings to messages, files or other types of Customer Data. The deletion of Customer Data and other use of the Services by the Customer may result in the deletion and/or de-identification of certain associated Other Information. Chattodo may retain Other Information pertaining to

you for as long as necessary for the purposes described in this Privacy Policy (such as to provide the Services, including any optional features that you use, and to provide customer support). This may include keeping your Other Information after you have deactivated your account for the period of time needed for Chattodo to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

Security

Chattodo takes security of data very seriously. Chattodo works hard to protect Information that you provide from loss, misuse and unauthorised access or disclosure. These steps take into account the sensitivity of the Information that we collect, process and store, and the current state of technology. Chattodo has received internationally recognised security certifications. To learn more about current practices and policies regarding security and confidentiality of the Services, please visit our [Security practices](#). Given the nature of communications and information processing technology, Chattodo cannot guarantee that Information during transmission through the Internet or while stored on our systems or otherwise in our care will be absolutely safe from intrusion by others. When you click a link to a third-party site, you will be leaving our site, and we don't control or endorse what is on third-party sites.

Age limitations

Chattodo does not allow use of our Services and Websites by anyone younger than 13 years old, to the extent prohibited by applicable law. If you learn that anyone younger than 13 has unlawfully provided us with personal data, please contact us and we will take steps to delete such information.

Changes to this Privacy Policy

Chattodo may change this Privacy Policy from time to time. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our services or business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, Chattodo will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you should deactivate your Services account. Contact the Customer if you wish to request the removal of Personal Data under their control.

Data Protection Officer

To communicate with our Data Protection Officer, please email dpo@chattodo.preseed.in.

Identifying the Data Controller and Processor

Data protection law in certain jurisdictions differentiates between the ‘controller’ and ‘processor’ of information. In general, the Customer is the controller of Customer Data. In general, Chattodo is the processor of Customer Data and the controller of Other Information. Different Chattodo entities provide the Services in different parts of the world.

Your rights

Subject to any exemptions provided by law, you may have the right to request access to your personal information, as well as to seek to update, delete or correct this information. You can do this using the settings and tools provided in your Services account. If you cannot use the settings and tools, contact the Customer who controls your collections for additional access and assistance. Please check <https://chattodo.preseed.in/> for Customer contact information.

Data Protection Authority

Subject to applicable law, you also have the right to (i) restrict Chattodo’s use of Other Information that constitutes your Personal Data and (ii) lodge a complaint with your local data protection authority. If, however, you believe that we have not been able to assist with your complaint or concern, and you are located in India, you have the right to lodge a complaint with the competent supervisory authority.

Contacting Chattodo

Please also feel free to contact Chattodo if you have any questions about this Privacy Policy or Chattodo’s practices or if you are seeking to exercise any of your statutory rights. Chattodo will respond within a reasonable timeframe. You can contact us at privacy@chattodo.preseed.in or at our postal address below:

For Customers and Authorised Users who use Collections established for Customers in the US and Canada:

Preseed Ventures P. Ltd.
PUT ADDRESS HERE

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