



Privacy Policy

A. Introduction

This Privacy Policy was last updated in February 2023.

Your privacy is important to Ultraviolette. Ultraviolette Automotive Private Limited its affiliates and/or subsidiaries (collectively, “Ultraviolette”, “we”, “us” or “our”) have developed this privacy policy.

Ultraviolette may collect, use, disclose, share, transfer or store your Personal Information, Sensitive Personal Information and Non-Personal Information (collectively “information”) according to the provisions of this Ultraviolette Privacy Policy. *By visiting the website i.e. <https://www.ultraviolette.com/> (herein after referred as “Site”) ”] or downloading the mobile application or any other medium used by Ultraviolette to provide its services to you (hereinafter referred to as the “Platform”),* you expressly agree to be bound by the terms and conditions of this Ultraviolette Privacy Policy. We value the trust you place in us and respect your privacy, maintaining the highest standards for secure transactions and protection of your personal information.

This Policy intends to inform you about how we collect, receive, hold, use, transfer and/or disclose your information, in accordance with the provisions of Information Technology Act, 2000 and any other applicable provisions, including amendments thereto for the time being in force (“Indian Data Protection Law”).

Ultraviolette reserves the sole, unilateral right to modify this Privacy Policy from time to time, as may be required due to change in business policies, government regulations etc. While reasonable efforts shall be made to notify you of any significant changes to our Privacy Policy, it is incumbent upon you to keep yourself apprised of any changes to this Privacy Policy by visiting this page periodically.

B. Personal and Sensitive Information Ultraviolette May Collect and Use

While visiting the Platform, you may be asked to provide Ultraviolette with “**Personal Information**” for different purposes, and Ultraviolette will collect and may store such Personal Information. Personal information shall include any information that specifically identifies an individual or natural person, including but not limited to, name, postal address, email address, telephone number, mobile number or employer, etc.

“**Sensitive Personal Information**” As per the Indian Data Protection Laws “Sensitive Personal Information” means Personal Information which consists of information relating to: (i) password; (ii) financial information such as Bank account or credit card or debit card or other payment instrument details; (iii) physical, physiological and mental health condition; (iv) sexual orientation; (v) medical records and history; (vi) biometric information; (vii) any detail relating to the above clauses as provided to a body corporate for providing service; and (viii) any of the information received under the above clauses by a body corporate for processing and/or is stored or processed under lawful contract or otherwise. For example, Sensitive Personal Information would include age,

medical history/records, weight etc. However, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other applicable law for the time being in force shall not be regarded as Sensitive Personal Information for the purposes of this Policy.

Considering the above, please be informed that We may collect and process one or more of the following Information pertaining to You. The type of Information we may require may change depending on whether You have just created an account, booking a test ride, or processing such Information. Any or all Information that is to be provided by You would be based on Your consent. However, We would like You to note that certain information would be required for performing one or more services. We are also required to collect certain Personal Information as required under applicable laws. You may opt-out from providing us your Personal Information or Sensitive Personal Information, however, You may not be able to avail Our services in such case.

We wish to assure you that Your Information is safe with us. We will process your Information lawfully and for purposes, details of which We have provided in the below section.

The following are the types of Personal Information pertaining to You that We may collect:

1. Full name;
2. E-mail address;
3. Date of birth;
4. Location information, including but not limited to the current location, saved location, pinned locations, searched locations and the GPS location of (a) any person placing an order through the Application; (b) while using location-based services through products and services; and (b) addresses provided for providing the products or services;
5. Address (including city or town);
6. Photograph of the user;
7. Emergency Contact Information;
8. Billing and shipping address;
9. Phone numbers;
10. Account login credentials and password;
11. Customer ID;
12. IP addresses;
13. Details of the products or services ordered including pricing;
14. Date of purchase of products or services;
15. Details of the vehicle purchased, e.g., vehicle license number, VIN, etc.;
16. Driving license no. and expiry date or any other official identification proof;
17. Vehicle insurance policy number;
18. Vehicle repair history;
19. Telematics data such as performance, operations, performance, usage of products through vehicle (more specifically described below) ;
20. User behavior and activities including but not limited to clicks done, marketing e- mails opened, number of page views, time of first session, time of last session, facebook clicks, google plus clicks, first conversion date, last e-mail sent date, number of submissions etc.
21. Cookies;
22. Payment information and history (excluding payment details that shall be collected and processed by an authorized payment service provider, which we do not collect);
23. Various certificates, e.g., registration certificate, insurance certificate, road tax certificate, etc.
24. Any device and device identifier information as may be deemed necessary;
25. Personal details of the secondary user, if provided;
26. We may automatically receive data on the successful pairing of the Bluetooth;
27. Such other Personal Data as may be required from time to time.

Please note that the Personal Information as listed above, other than financial information, is not Sensitive Personal Information. We wish to share that it is possible that the Government of India may categorize some of the other types of Personal Information as Sensitive Personal Data/Information. In such cases, We will inform You of the same and obtain Your consent as, and if required.

It is also clarified that if You provide any data relating to Your Aadhaar then the same shall be stored in the manner as mandated by UIDAI.

For Personal Information received by Ultraviolette, it shall be deemed that you knowingly and specifically agreed to provide such Personal Information. In no event you shall not provide to us any Personal Information pertains to third party without such third party's prior consent. If you do not agree to provide your Personal Information, Ultraviolette may not be able to inform you of any updates including, but not limited to, updates to Ultraviolette products, Terms of Use or Ultraviolette Privacy Policy.

C. Personal Information Ultraviolette may use

Ultraviolette may use your Personal Information by itself, or through or together with its affiliates, subsidiaries, strategic partners or third parties, if any, who act on our behalf by disclosure, share or transfer of your Personal Information for purposes below including:

1. Where it is in both Your and our benefit that We further process your Information as part of our business administration, delivery of product or vehicle, its maintenance and safety and security, maintaining service quality, customer care, business management, risk assessment/management, security, and operation purposes;
2. to provide the services, products, or information you request, and to process and complete such requests and any related transactions;
3. to send you confirmations, updates, alerts, and support and administrative messages and otherwise facilitate your use of, and our administration and operation of the platform;
4. to keep you informed about various promotions, offers, events, products or services;
5. For conducting marketing activities, for our services or services of third parties, and to conduct market and other research to improve our services and marketing activities;
6. to send you notices, such as changes to the Ultraviolette Platform, the Terms of Use, Ultraviolette Privacy Policy or any other policy or guideline;
7. for internal purposes, such as research, auditing or data analysis; or
8. To allow You to participate in interactive features of our service, when You choose to do so
9. to comply with any court order, law or legal process, including to respond to any government or regulatory request.

For example,

1. We determine Your real time location in order to provide various location- enabled services, such as navigation. You will have to specify whether determining and collecting real time location is to be active or not.
2. When You visit our Application, usage data is collected automatically through the Application. Such usage data can include the type of device, the IP address, and the current location. This is for security reasons, in particular, to prevent and detect attacks on our Application or attempts at fraud.
3. The information about Your click and search behavior is used to adjust the Application or enhance the features of our Services in order to make the Application layout more convenient to You, change the order of search results and to design certain pages differently, for Your convenience.

4. The information collected through cookies shall be used for the purposes of advertising and analytics. We collect usage data by using various types of cookies (small pieces of data stored in your device) and other tracking tools.
5. Certain telematics data from the vehicle is collected to further improve the performance of Your vehicle, ensure safety, to facilitate the servicing of Your vehicle and to give You insight on Your driving behaviour. The telematics data shall include Personal Information such as vehicle identification number, and other device related information, such as performance, usage, operation, condition of your vehicle, etc. The Ultraviolette vehicle is equipped with several devices commonly referred to as "Event Data Recorders" which record various types of real time vehicle data AND with service-related devices that record information about powertrain performance and driving conditions. This data belongs to the customer and may not be accessed by anyone else except as legally required or with the permission of the customer. However, this data may be accessed by Ultraviolette, its authorized repairers, employees, representatives, its service providers and contractors only for the purpose of the technical diagnosis, research and development of your vehicle.

D. Types of Data collected and option to withdraw your consent

Data collected from you can be classified in the following manner:

1. **Essential** - This type of data is related with the health check of the vehicle i.e. performance log of various subsystems parameters, perform Over-The-Air's ("OTAs") etc. This type of data is not considered as personal information.
2. **Diagnostic** - This type of data will be accessed by Us in case there is any requirement to perform diagnostics or service task. This type of data is not considered as personal information.
3. **Location** - This type of data will be accessed by us to provide features like navigation, trip history, geofencing, lockdown etc. This type of data is not considered as personal information. User can turn on incognito mode on app to control this.
4. **User provided information or personal information:** Name, date of birth, phone number, email-id, license, vehicle insurance, etc., will be accessed to provide enhanced features.

Your consent is voluntary to provide above mentioned data and may always be revoked, for example by terminating a particular service or contacting our representative in the manner indicated in later sections. Where Your consent is required and You do not give Your consent or consent withdrawn/revoked subsequently, it may not be possible for You to use the Application and/or avail the services being offered by us.

Your data is Yours - if You wish to withdraw Your consent at any time, You can let Us know at info@ultraviolette.com. Following will be the consequences of withdrawing consent and it may disrupt some services;

1. In case of Essential or Diagnostic data this may lead to void your vehicle warranty
2. In case of Location data, We may not be able to provide any features related to this type of data
3. In case of Personal Information we may not be able to perform certain operations, such as processing Your vehicle purchase and ensuring that You are able to access various features of the Application, we would require certain Personal Information which is essential for completion of such operations.

If You choose to withdraw Your consent, We may not be able to provide You with any or all of our services.

E. Purpose, Processing of Personal Information and Your Personal Information is collected at the following stages:

I) Your Personal Information is collected at the following stages:

1. When You register on the Application and create a user account;
2. When You visit and/or use our Platform;
3. When You book a test ride;
4. When You pre-order or purchase our products or services;
5. When You set up and drive any of our products;
6. When We communicate or undertake activities such as servicing, referrals, affiliates, brand champions, and/or other promotional activities, etc.

II) How Your Information is Processed (Processing):

The information may be collected and processed by our Platform and its service providers. Your Personal Information is processed by us and by our service providers under different circumstances and under a different lawful basis. The same is provided below for Your information:

1. Where you have provided Consent

We may use and process Your Personal Information and Sensitive Personal Data where You have consented for Us to do so for the following purposes:

- i. Process Your contact information, such as Your email ID, full name and contact number to create Your User Account on the Platform;
- ii. Process Your Personal Information, such as Your name, contact information and address location for arranging for test drives, or where You have requested a call back for further information about our products and services. Such information may be further processed when the test drive has been completed;
- iii. Process Your Personal Information, such as contact information, photograph, address of delivery, driving license or any other ID proof for processing and completing Your purchase and creation of Your User Account;
- iv. Processing Personal Information as indicated above to process a return, if You are not happy with Your vehicle, Process payments (or refunds as the case may be) on Your behalf by using Your financial information;
- v. If You have opted for location-based features, We may collect and process various location specific information, in the form of Your favorite locations, saved locations, pinned locations, searched locations, etc., for providing various location-based services, such as our stores, charging stations, repair facilities and other services relating to the products that are close to Your location;
- vi. Processing Personal Information and vehicle information for servicing and/or repair activities;
- vii. To supply brochures and other material You have specifically requested from Us;
- viii. Where You have opted in, to be contacted by Us or by our authorized dealers or our recommended third-party partners via email, text message, post or telephone with marketing information about their products and services (see Marketing section below for further details); and
- ix. Complete and perform other processing activities that You have expressly requested Us to complete or You have expressly agreed to Us performing, as the case may be. In such cases, We will again be taking Your consent for such requested processing activities.

Your data is Yours - if You wish to withdraw Your consent at any time, You can let Us know at info@ultraviolette.com. Certain operations, such as processing Your vehicle purchase and ensuring that You are able to access various features of the Platform, we would require certain Personal Information which is essential for completion of such operations. If You choose to withdraw Your consent, We may not be able to provide You with any or all of our services.

2. To perform a Contract with You

We may use and process Your Personal Information where it is necessary for the performance of a contract with You or in order to take steps at Your request before entering into a contract with You.

3. Where it is in Your Vital Interest in emergent situations
We may use Your personal information to reach to You if there are any urgent safety or product recall notices to communicate to You to ensure Your safety. We may also use the contact information of Your 'Emergency Contact' in the event of an incident, or where We otherwise reasonably believe that the processing of Your Personal Information will prevent or reduce any potential harm to You or others. Similarly, we will process your Personal Information such as name, contact number, account login credentials and password when attempts to login to your account with a wrong password exceeds the permitted number, in order to verify your identity and help you recover your account.
4. Where there is a Legitimate Interest or for other Reasonable Purposes
We may use and process Your Personal Information where it is necessary for Us to pursue our legitimate interests and for other reasonable purposes as a business without compromising Your privacy for the following purposes:
 - i. For analysis which will aid our marketing strategy or market research;
 - ii. To improve, enhance and personalize Your customer or visitor experience;
 - iii. To manage and maintain the Application, and for internal practices, including troubleshooting, testing for security, statistical purposes, and for prevention of any misuse or fraud;
 - iv. For network and information security;
 - v. For marketing activities (other than where we rely on Your consent), e.g., to tailor marketing communications or send targeted marketing messages via social media and other third-party platforms; and if You have asked Us not to contact You for marketing purposes, you are free to update with us for 'do not disturb' mode; and
5. For Compliance with Existing or Applicable Laws
Wherever the law mandates Us to process certain data for compliance or other legal purposes, We will have to collect Your Personal Information to abide by it. This may include information like collecting your age proof or driving license before You are permitted to have a test drive.
6. Third party Applications/Links:
Through the use of the Application, You may access certain third party applications, links and other services linked with the vehicle but provided by a third party, which may, for example, require transmission of location data and other Vehicle-recorded data to such third party. We are not responsible for the collection or use of Personal Data in such applications or services provided by a third-party and recommend that You carefully review applicable terms for (and any integrity policy related to) such applications or services before You use them. If You have questions concerning a certain third party's use of Your Personal Data, please contact the third party directly.
7. Sharing/Transfer of Personal Data
We shall exercise reasonable care to keep Your information confidential to the maximum possible extent. We may limit disclosure of the user information to our entities, joint ventures, agents, sellers or third parties for the purposes of the services provided herein or for any other marketing related activity undertaken by or on behalf of our entities and/or its joint ventures on a need-to-know basis.

As You are aware, We might share Your Personal Information with our partners/third party service providers in order to improve our service. We make sure that they are as committed as We are to protecting Your Data and Information.

F. International transfers

We may transfer your Personal Data to recipients in countries outside India that may have differing data protection laws. In those instances, We will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. 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.

In case of Sensitive Personal Data, We will specifically seek Your consent before such transfers to other countries, and will also ensure that the conditions as required under law (including but not limited to the Indian Data Protection Laws) for such international transfer of sensitive data, such as adequate level of protection to your Sensitive Personal Data, are complied with.

G. Retention

We will only retain your Personal Data for as long as it is necessary to fulfill the purposes outlined in this Policy or the purposes of which You have otherwise been informed. This means that when You have consented to our processing of Your Personal Data, We will retain the data for as long as the customer relationship lasts (and, where applicable, until the expiry of the warranty period) or until You withdraw Your consent. If You have revoked Your consent, We may nevertheless retain certain Personal Data for the period required in order for Us to meet our legal obligations and defend ourselves in legal disputes. We will redact or delete Your Sensitive Personal Data if you withdraw your consent, unless required to be retained by applicable law. If We have not received Your consent for Processing, the Personal Data will only be retained to the extent We are permitted to do so by law.

H. Your Rights

If you live anywhere in India, the law has various rights bestowed on You in relation to Your Personal Data. We will have to confirm Your identity, wherever applicable, to ensure that Your rights are being exercised appropriately. To exercise these rights You will have to write to Us at info@ultraviolette.com.

Except in exceptional circumstances, We will respond to Your request within 24 hours during working hours (twenty-four hours) stating that when it will be completed from the date We receive your email. We may charge a minor sum to comply with your exercise of these rights to aid the cost We incur for this compliance. You will be informed of these charges once You write to us. Please be informed that You have the following rights under applicable laws in your country.

1. Accessing Your Personal Information

You have the right to access a copy Your Personal Information that We hold in a standard form that will be easy and understandable. In rare occasions We may not provide You with a copy of Your information in which case We will convey You this message with appropriate reasons. Generally, We can only deny You Your right of access if it concerns the right of other individuals or We have another lawful reason to withhold that information and not otherwise. You also have the right to access in one place the identities of the data fiduciaries with whom Your Personal Data has been shared by Us together with the categories of Personal Data shared with them.

2. Verify and rectify

Accuracy is an important principle of data protection and You have the right to verify Your Information with Us and ask Us to rectify it if it is inaccurate.

3. Withdrawing Your consent

You can always withdraw Your consent You have given Us. We will be bound to stop collecting or processing Your data We collect from You solely on the basis of Your consent. For instance, there are certain data points for which We take Your explicit consent like GPS tracking. You can withdraw from GPS tracking anytime by using the Application. However, We will accordingly be unable to offer You other services that are dependent on GPS tracking like navigation.

Also, we are legally permitted to continue collecting or processing Your Personal Data if we can rely on grounds other than consent to process Your Information.

4. Erasing Your Personal Information

You have the right to get Your Information erased from our systems, as per processes prescribed under applicable laws. Unless there is a reason that the law allows Us to use Your Personal Information for longer, We will make reasonable efforts to comply with Your request.

5. Your right to port Your Information

You have the right to ask for a copy of information that We collect from You in a structured data file. We will provide this to You electronically in a structured, commonly used and machine-readable form.

6. Your right to be forgotten

You may also ask Us to restrict or prevent processing Your Personal Information in the following situations:

- where You believe it is unlawful for Us to do so,
- You have objected to its use or withdrawn Your consent and our assessment is pending or
- Where Your data has served the purpose

In these situations, We may only process Your Personal Information whilst its processing is restricted if We have Your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

I. Data Breach:

In case of breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Information transmitted, stored or otherwise processed, We will promptly notify You within the time frame prescribed, as per applicable laws. However, We will not be liable for any security breach committed as a result of negligence by action or omission by You including, but not limited to, setting up of a weak passcode for Your account.

J. Security:

We strive to work towards the security, integrity and privacy of Your Information and to protect Your Information against unauthorized disclosure, access or destruction to the extent reasonably possible by Us as per processes compliant with the applicable laws.

Notwithstanding anything contained in this Policy or elsewhere, We shall not be held responsible for any loss, damage or misuse of Your Information, if such loss, damage or misuse takes place as a result of a Force Majeure Event (as defined below).

A "Force Majeure Event" shall mean any event that is beyond our reasonable control and shall include, without limitation, fire, flood, explosion, acts of God, civil commotion, strikes, insurrection, war, epidemic, pandemic, acts of government, computer hacking, software failure and storage device, computer crashes etc.

K. Phishing:

Identity theft and the fraudulent practice currently known as "phishing" are of great concern to Us. Phishing is an attempt to acquire personal/sensitive information which the legitimate organization already has. Safeguarding information to help protect You from identity theft is a top priority. We do not and will not, at any time, request Your credit card information or national identification numbers in a non-secure or unsolicited e-mail or telephone communication. Please exercise caution while providing any such information.

L. Non-Personal Information Ultraviolette May Collect and Use

i. Non-Personal Information Ultraviolette may collect

Once you visit the Ultraviolette Platform or act on a Ultraviolette email, Ultraviolette or Ultraviolette's strategic partners may use some technologies to collect "Non-Personal Information" about your usage of or activity on the Platform that cannot, on its own, identify or allow direct association with a specific individual. Non-Personal Information may include, without limitation, information collected by or through web beacons or cookies.

For instance, web beacons are electronic images that we use on the Site or in Ultraviolette email or on any other Platform that Ultraviolette sends to you, for the purpose of understanding your usage when you open or take any action via the email.

ii. Non-Personal Information Ultraviolette may use

Ultraviolette Privacy Policy does not limit our use or disclosure of any Non-Personal Information in any way, and we reserve the right to use and disclose Non-Personal Information to our affiliates, subsidiaries, its strategic partners or third parties at our discretion. For instance, such Non-Personal Information may be used to better understand your behavior, to realize which parts of the Platform that visitors have visited, and to facilitate and measure the effectiveness of advertisements and web searches.

M. Minor/Children

Ultraviolette is not intended for children under Eighteen (18) years of age. Ultraviolette, its affiliates, subsidiaries or its strategic partners do not knowingly or intentionally collect, disclose, share, transfer any Personal Information from children under the age of Eighteen (18) and you should not, under any circumstance or for any reason, provide your Personal Information if you are under the age of Eighteen (18). If Ultraviolette becomes aware of any collection of any Personal Information of a child under the age of Eighteen (18), Ultraviolette will take steps to delete such Personal Information.

N. Changes to Ultraviolette Privacy Policy

Ultraviolette may change the provisions of Ultraviolette Privacy Policy at any time. If we change or update Ultraviolette Privacy Policy, we will indicate that changes have been made by updating the effective date of Ultraviolette Privacy Policy. Ultraviolette encourages you to review Ultraviolette Privacy Policy from time to time to make sure you understand how any personal information you provide may be used.

O. Ultraviolette may use cookies

We and our partners use tracking technologies such as cookies on our Platform to personalize content and ads, to provide social media features and to analyze our traffic. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you have provided to them or that they have collected from your use of their or other services.

We reserve the right to make changes to the cookie statement at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of the cookie statement. Any changes will become effective immediately upon posting the updated statement on our Platform and you waive the right to receive specific notices of each such change. You are encouraged to periodically review this policy to stay informed of updates.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. Note that disabling cookies might hinder the transacting of business on the Platform.

P. Telematics data

You understand that the motorcycle will capture telematics data that includes location, speed, idling, time, harsh acceleration or breaking, battery charge and discharge consumption, GPS, and driving behavior and data vehicle faults etc. the said data will be managed as per this privacy policy.

The data is stored by the vehicle and may be accessed, used and stored by our service technicians during vehicle servicing or periodically transmitted to us wirelessly through the vehicle’s telematics system. This data may be used by us for various purposes, including, but not limited to: providing you with telematics services; troubleshooting; evaluation of your vehicle’s quality, functionality and performance; analysis and research by Ultraviolette and its partners for the improvement and design of our vehicles and systems; to defend Ultraviolette; and as otherwise may be required by law. In servicing your vehicle, Ultraviolette can potentially resolve issues remotely simply by reviewing your vehicle’s data log.

Q. Contact

We welcome feedback if you have any questions regarding our Privacy Policy or the use of your information, please send an email to info@ultraviolette.com, or write to us at 529-530, Intermediate Ring Road, Domlur, Bangalore 560071 Karnataka India.

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