

PRIVACY POLICY

Document owner	Legal Department	Policy version	1.0
Effective / Last updated date	01 December 2025	Review cycle	Annually, and earlier where required due to any change in applicable law, regulatory direction, business process or data-processing practice.
Primary contact	legal@savex.in	Registered office	124-B, 12th Floor, Maker Chambers III, Nariman Point, Mumbai - 400 021, India.

Policy statement

Savex processes Personal Data in a lawful, fair and responsible manner. Savex collects Personal Data only for identified purposes, protects it through reasonable safeguards, and provides a practical mechanism for privacy requests and grievances. All persons covered by this Policy are expected to understand and adhere to the principles and requirements set out herein, to the extent applicable to their role or interaction with Savex.

Data handling sequence used in this Policy

Notice Explain what is collected and why	→	Collect Receive only relevant personal data	→	Use Process for specified and lawful purposes	→	Share Disclose on need-to-know basis	→	Retain / delete Retain lawfully, erase or anonymise thereafter
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1. Introduction:

Savex Technologies Private Limited, a company incorporated under the laws of India and having its registered office at 124-B, 12th Floor, Maker Chambers III, Nariman Point, Mumbai 400 021, India ("**Savex**", "**Company**", "**we**", "**us**" or "**our**"), respects the privacy of individuals whose Personal Data is processed by or on behalf of Savex.

This Privacy Policy explains how Savex collects, receives, uses, stores, shares, transfers, protects and otherwise processes Personal Data, including Digital Personal Data, in connection with its website, online forms, business communications and related contact points. This Policy is intended to operate as a privacy notice for the purposes of applicable Indian law, including the Digital Personal Data

Protection Act, 2023 (“**DPDP Act**”) and the rules and notifications issued thereunder, as may be applicable and in force from time to time.

Savex generally acts as a Data Fiduciary where it determines the purpose and means of processing personal data. In limited cases, Savex may process Personal Data on behalf of another entity or principal under contractual arrangements, in which case the applicable agreement and instructions of such entity may also govern the processing.

2. Scope and applicability:

This Policy applies to Personal Data processed by Savex in connection with the following touchpoints: the website www.savex.in, any sub-domain or web page controlled by Savex that links to this Policy, online enquiry or contact forms, B2B marketing or event registrations, customer/vendor/channel partner communications, service or support interactions, and other business contact points where this Policy is made available.

This Policy does not apply to third-party websites, platforms or applications that are not operated or controlled by Savex, even if such websites or platforms are linked from the Savex website. It also does not replace specific privacy notices, contractual privacy clauses, employee privacy notices, vendor terms, reseller terms, customer contracts, recruitment notices, or product-specific privacy terms where those are separately issued by Savex or by the relevant OEM, licensor, customer, vendor or platform operator.

In case of any inconsistency between this Policy and any specific privacy notice, employee notice, vendor term, reseller term, customer contract, recruitment notice, product-specific term or contractual privacy clause issued for a particular activity, the more specific document shall prevail for that activity, subject to mandatory applicable law.

3. Key terms used in this Policy:

Term	Meaning in this Policy
Personal Data	<i>Any data about an individual who is identifiable by or in relation to such data, whether directly or indirectly.</i>
Digital Personal Data	<i>Personal Data in digital form, or Personal Data collected in non-digital form and subsequently digitised.</i>
Data Principal	<i>The individual to whom the Personal Data relates and, where applicable, the parent or lawful guardian of a child or person with disability. For a person with disability, reference to lawful guardian shall apply only where such guardian is recognised or applicable under law.</i>
Data Fiduciary	<i>A person or entity that determines the purpose and means of processing Personal Data.</i>
Data Processor	<i>A person or entity that processes Personal Data on behalf of a Data Fiduciary.</i>

Term	Meaning in this Policy
Processing	<i>Any operation performed on Personal Data, including collection, recording, organisation, storage, use, sharing, disclosure, retrieval, restriction, erasure or destruction.</i>
Consent	<i>A free, specific, informed, unconditional and unambiguous indication of the Data Principal's agreement, given by clear affirmative action, where consent is required under applicable law.</i>

4. Personal Data collected or received by Savex:

Savex collects or receives only such Personal Data as is reasonably relevant for its business, operational, statutory, security or communication purposes. Depending on the context, the following categories of information may be processed:

Category	Illustrative data elements	Typical source
Identity and business contact data	<i>Name, designation, organisation, business address, email ID, telephone/mobile number, department, professional role and signature details where relevant.</i>	<i>Directly from the individual, employer, customer, vendor, channel partner, OEM or business contact.</i>
Enquiry and communication data	<i>Information contained in contact forms, requests for information, proposals, complaints, feedback, emails, call notes, attachments and correspondence.</i>	<i>Direct submission, email, phone, website forms or business communications.</i>
Transaction and relationship data	<i>Customer/vendor/partner onboarding records, purchase order references, invoice references, payment or collection details, service/support tickets and relationship management records.</i>	<i>Business dealings with Savex, its customers, vendors, OEMs, resellers, logistics partners or service providers.</i>
Technical and website data	<i>IP address, browser type, device identifiers, operating system, date/time of access, pages visited, referring URL, cookies and similar online identifiers.</i>	<i>Automatically through website servers, cookies, analytics tools or security logs.</i>
Event and marketing data	<i>Event registration details, attendance, preferences, communication opt-in/opt-out status and campaign interaction data.</i>	<i>Direct registration, event organisers, marketing platforms or business partners.</i>
Compliance and security data	<i>KYC-type business records, authorisations, system trails, access logs, incident records, fraud-prevention information and legal/regulatory correspondence.</i>	<i>Internal systems, lawful third-party sources, advisers, regulators or business counterparties.</i>

Savex does not ordinarily seek to collect financial records, identity documents, statutory identifiers, health-related information, children's data or other information requiring additional safeguards through

general website browsing. Where any such information is collected or received in a specific business, contractual, statutory, compliance, onboarding, employment, service, support or legal context, Savex will process such information only where relevant and in accordance with applicable law, contractual requirements and internal controls. Savex does not intentionally collect more Personal Data than is reasonably necessary for the identified purpose.

5. How Personal Data is collected

Savex may collect or receive Personal Data directly from the Data Principal, from the organisation represented by the Data Principal, from customers, vendors, OEMs, resellers, logistics partners, service providers, event organisers, marketing partners, public sources, statutory or regulatory sources, and from Savex's own systems and records generated during ordinary business operations.

Where a third party provides Personal Data to Savex, Savex expects such third party to ensure that the Personal Data has been collected, shared and disclosed to Savex in accordance with applicable law, including any applicable notice, consent, authorisation or contractual requirement.

6. Purposes for which Personal Data is processed:

Savex processes Personal Data for specified and lawful purposes connected with its business as an ICT distributor and related service operations. The principal purposes are set out below.

Purpose	Description of processing	Usual Data involved
Responding to requests	<i>Receiving, evaluating and responding to product, solution, pricing, partner, vendor, support, service or general business enquiries.</i>	<i>Contact and enquiry data</i>
Business relationship management	<i>Onboarding, managing, communicating with and supporting customers, resellers, vendors, service providers, OEMs, channel partners and other business counterparties.</i>	<i>Identity, relationship and transaction Data</i>
Order, finance and operations	<i>Processing purchase orders, invoices, payments, collections, delivery coordination, service tickets, claims, reconciliations and business records.</i>	<i>Transaction, contact and compliance Data</i>
Website operation and security	<i>Operating, maintaining, securing, monitoring, troubleshooting and improving the website, online systems and related IT infrastructure.</i>	<i>Technical, cookie and security Data</i>
Marketing and events	<i>Sending B2B communications, campaign information, event invitations, newsletters and updates relevant to the role, organisation or expressed interest of the recipient, subject to opt-out rights.</i>	<i>Contact, preference and event Data</i>

Purpose	Description of processing	Usual Data involved
Legal and compliance	<i>Complying with applicable law, tax, accounting, company law, contractual, audit, litigation, regulatory and law-enforcement requirements.</i>	<i>Compliance, Transaction and Communication Data</i>
Risk, fraud and security	<i>Preventing, Detecting, Investigating and addressing fraud, misuse, cyber incidents, unauthorised access, disputes, claims, policy violations and security events.</i>	<i>Security, Technical and Compliance Data</i>

7. Legal basis for processing under Indian law:

Savex processes Digital Personal Data only for lawful purposes. Depending on the facts, Savex may rely on one or more of the following bases recognised under the DPDP Act and applicable Indian law:

Basis	How it may apply to Savex
Consent	<i>Where Savex asks for consent, the request will be linked to a specified purpose, and the Data Principal may withdraw consent in the manner set out in this Policy or through the relevant consent/preference mechanism.</i>
Voluntary provision of Personal Data	<i>Where an individual voluntarily provides Personal Data to Savex for a specified purpose, Savex may process such Data for that purpose, for example to respond to an enquiry, process a request or continue a business communication initiated by the individual.</i>
Certain legitimate uses	<i>Savex may process Personal Data without separate consent where the DPDP Act permits processing for certain legitimate uses, including employment-related purposes, safeguarding the employer from loss or liability, statutory functions, medical emergencies, disaster situations, court/tribunal directions, or other cases recognised by law, as applicable.</i>
Compliance and legal claims	<i>Savex may process and retain Personal Data where necessary for compliance with law, regulatory requirements, tax/accounting obligations, audits, contractual enforcement, dispute resolution, prevention of fraud, cyber security, investigation or defence of legal claims.</i>

References in this Policy to contractual performance, relationship management or business operations are to be read as practical descriptions of the purposes for processing. They do not create any separate statutory ground beyond what is permitted under applicable Indian law.

8. Consent, notice and withdrawal:

Where consent is required, Savex will seek consent in a manner intended to be specific, informed and capable of being withdrawn. A request for consent may be accompanied or preceded by a notice

explaining the relevant categories of Personal Data, the specified purpose of processing, and the way the Data Principal may exercise rights or raise a grievance.

A Data Principal may withdraw consent by using the unsubscribe or preference mechanism provided in the relevant communication, or by contacting Savex at legal@savex.in. Withdrawal of consent will not affect processing carried out prior to the withdrawal and will not prevent processing that is otherwise permitted or required under applicable law.

If consent is withdrawn or requested information is not provided, Savex may be unable to process the relevant request, continue the relevant communication, complete an onboarding or transaction, or fulfil the purpose for which the Personal Data was requested.

9. Cookies and similar technologies:

Savex's website may use cookies, server logs, analytics tags and similar technologies for core website functionality, security, preference management, performance measurement, analytics and improvement of user experience. Some cookies may be essential for the website to operate, while others may support analytics or preference-based functions.

Where required under applicable law, Savex may provide a cookie notice or preference mechanism. Users may also control or disable cookies through browser settings. Disabling certain cookies may affect website functionality or user experience.

10. Disclosure and Sharing of Personal Data:

Savex does not sell Personal Data. Personal Data may be shared only where there is a lawful, business, operational, contractual, compliance, security or statutory need. The following table explains the usual categories of recipients.

Recipient category	Reason for sharing
Savex group entities and internal teams	Centralised business operations, finance, legal, compliance, risk management, reporting, IT support, information security and management oversight.
OEMs, licensors and suppliers	Product or solution enquiries, distribution, fulfilment, partner programmes, warranty/service coordination, reporting, incentives, pricing support and compliance with OEM programme requirements.
Customers, resellers, sub-distributors, system integrators and channel partners	Order fulfilment, business coordination, support, service delivery, collections, issue resolution and transaction administration.
Service providers and processors	Hosting, cloud, IT support, CRM, ticketing, analytics, email, communications, logistics, warehousing, courier, payment, compliance support, marketing/event and document management services.

Recipient category	Reason for sharing
Professional advisers, auditors and insurers	Legal advice, statutory review / financial review, taxation, accounting, insurance, risk review, dispute handling and corporate governance.
Government, regulators, courts and law-enforcement authorities	Compliance with law, court orders, regulatory requests, statutory reporting, investigations, fraud prevention and protection of legal rights.

Savex will, where appropriate, require service providers and processors that process Personal Data on Savex's behalf to implement reasonable security safeguards and to process Personal Data only for the permitted purposes and in accordance with applicable contractual obligations and law. Such obligations may include confidentiality, access restrictions, breach-reporting support, deletion/return obligations and cooperation with reasonable compliance reviews or security-related enquiries, where appropriate.

11. International Transfers:

Savex may transfer or make available Personal Data to recipients outside India where such transfer is necessary for business operations, support, hosting, cloud services, group reporting, OEM/vendor coordination, security, compliance, legal claims or other purposes described in this Policy.

Such transfers will be undertaken subject to applicable Indian law and any requirements, restrictions or conditions that may be specified by the Central Government or any competent authority from time to time in respect of making Personal Data available outside India. Savex may also use contractual, organisational and technical safeguards appropriate to the nature of the Data and the recipient.

12. Retention, Deletion and Anonymisation:

Savex retains Personal Data only for as long as it is reasonably required for the purpose for which it was collected or otherwise processed, or for such longer period as may be necessary for legal, tax, accounting, audit, regulatory, contractual, security, fraud-prevention, dispute-resolution or legitimate business purposes.

Retention periods may differ depending on the type of record. For example, general website logs may be retained for security and troubleshooting purposes, transaction, accounting and tax records may be retained for statutory periods, legal and dispute records may be retained until final closure of the matter and expiry of applicable limitation periods and marketing contact Data may be retained until the recipient opts out or the Data is no longer relevant for the stated purpose.

Where Personal Data is no longer required for any lawful purpose, Savex will take reasonable steps to delete, anonymise, de-identify, archive or restrict access to such data in accordance with applicable law and internal retention practices. Certain logs and processing records may be retained for minimum periods where required by applicable law, including Information Technology and Data Protection requirements.

Retention decision path

Purpose check	→	Legal check	→	Risk check	→	Action
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Is the specified purpose still active?		Is retention required by law or statutory/internal compliance requirement?		Is retention needed for claims/security?		Retain, archive, erase or anonymise
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13. Rights of Data Principals:

Subject to applicable law and verification of identity or authority, a Data Principal may exercise the following rights in relation to Digital Personal Data processed by Savex:

Right / choice	What it means
Access information	Request a summary of Personal Data processed by Savex, processing activities and information about sharing, to the extent required under applicable law. Where required by law, this may include information regarding the identities or categories of Data Fiduciaries and Data Processors with whom the Personal Data has been shared.
Correction, completion and updating	Request correction of inaccurate or misleading personal data, completion of incomplete Personal Data, or updating of Personal Data.
Erasure	Request erasure of Personal Data where it is no longer necessary for the specified purpose and retention is not required by law or on another lawful basis.
Withdrawal of consent	Withdraw consent where processing is based on consent, without affecting prior lawful processing or processing that is otherwise permitted by law.
Grievance redressal	Raise a grievance regarding Savex's handling of Personal Data or exercise of rights through the contact details in this Policy.
Nomination	Nominate another individual to exercise rights in the event of death or incapacity, in the manner and when permitted or operationalised under applicable law and Savex's applicable processes.

A rights request may be sent to legal@savex.in. Savex may request information reasonably necessary to identify the Data Principal, verify the request, locate the relevant records and prevent unauthorised disclosure. Savex may refuse, limit or defer a request where permitted by law, including where compliance would affect the rights of others, compromise security, conflict with legal obligations, or require retention of Data for lawful purposes.

A Data Principal is expected to provide authentic information, not impersonate another person, not suppress material information, and not file false or frivolous grievances or complaints.

Savex may decline, defer or seek clarification on requests that are incomplete, unverifiable, repetitive, excessive, fraudulent, technically impracticable or contrary to applicable law.

14. Grievance redressal and contact details:

Questions, requests or grievances concerning this Policy or Savex's processing of Personal Data may be addressed to:

Data Protection Contact / Grievance Contact	<i>Legal Department, Savex Technologies Private Limited</i>
Email	<i>legal@savex.in</i>
Postal address	<i>124-B, 12th Floor, Maker Chambers III, Nariman Point, Mumbai - 400 021, India</i>
Reference to include	<i>Name, organisation, contact details, nature of request/grievance, relevant transaction/reference number, and any information required to identify the record concerned</i>

Savex will assess and respond to grievances within the period prescribed under applicable law. Where no specific statutory period is applicable or in force, Savex will endeavour to respond within a reasonable period based on the nature and complexity of the request.

15. Security safeguards

Savex implements reasonable technical and organisational safeguards to protect Personal Data against unauthorised access, disclosure, alteration, loss, misuse, destruction or other unlawful processing. The safeguards are applied having regard to the nature, scope, context and purposes of processing, the category of Personal Data, the systems involved and the risks associated with the processing. Such safeguards may be reviewed and updated from time to time based on legal requirements, business needs, security risks, technological changes and internal information security standards.

Safeguard area	Illustrative controls
Access and identity control	<i>Role-based access, restricted access to business systems, user authentication, periodic access review and separation of duties where appropriate.</i>
Technical protection	<i>Network and application security, endpoint controls, encryption or masking where appropriate, backup arrangements and secure configuration practices.</i>
Monitoring and logging	<i>System logs, access logs, incident monitoring, review of unauthorised access indicators and retention of relevant security records where required.</i>
Processor and vendor controls	<i>Contractual obligations requiring processors and service providers to use appropriate security safeguards and process Data only for authorised purposes. Such obligations may include confidentiality, restricted access, breach reporting support, deletion/return obligations and cooperation with reasonable compliance reviews or security-related enquiries, where appropriate.</i>

Safeguard area	Illustrative controls
Governance and response	<i>Internal policies, security reviews, incident-response measures, staff awareness, internal compliance checks and remedial actions after security events.</i>

The safeguards mentioned above are illustrative and may vary depending on the nature of the processing, system, vendor, business process and applicable legal requirement. Nothing in this Policy requires Savex to disclose confidential, commercially sensitive or security-sensitive details of its internal systems, security architecture, controls, security reviews, internal assessments or incident-response procedures.

No electronic transmission or storage system can be guaranteed as absolutely secure. However, Savex will continue to maintain and improve safeguards in accordance with business needs, industry practice, applicable law and internal information security standards. To the extent permitted under applicable law, Savex shall not be responsible for any unauthorised access, disclosure, alteration, loss or misuse of Personal Data caused by factors beyond its reasonable control, including acts or omissions of the Data Principal, compromise of user devices or credentials, third-party platforms, cyber incidents despite reasonable safeguards, force majeure events, or unlawful acts of third parties.

16. Personal Data Breach and Incident Handling:

If Savex becomes aware of a Personal Data breach or suspected security incident affecting Personal Data, Savex will assess the nature and scope of the incident, take reasonable containment and remedial measures, preserve relevant evidence, involve appropriate internal and external stakeholders, and make notifications where required under applicable law. Savex may also require relevant employees, processors, vendors, service providers and business partners to provide reasonable cooperation, information and assistance for investigation, containment, remediation and legally required notifications.

Where applicable law requires intimation to affected Data Principals, the Data Protection Board of India or any other authority, Savex will make such intimation in the form, manner and timeline prescribed by law, to the extent such requirement is applicable, in force and binding on Savex at the relevant time.

Savex may withhold, limit or defer disclosure of certain details where such disclosure may compromise security, affect an ongoing investigation, expose vulnerabilities, prejudice legal rights, breach confidentiality obligations, or be restricted by law-enforcement, regulatory or legal requirements. This shall not affect any mandatory notification obligation applicable to Savex under law.

17. Children and persons with disability:

Savex's website and B2B business contact points are not directed at children. Savex does not knowingly seek to collect Personal Data of children through general website browsing or B2B enquiry forms. If Savex is required to process Personal Data of a child or a person with disability who has a lawful guardian, in a specific and lawful context, Savex will obtain verifiable consent or lawful authorisation from the parent or lawful guardian where required under applicable law.

Savex will not knowingly undertake tracking, behavioural monitoring or targeted advertising directed at children in a manner prohibited by applicable law. Savex will also not knowingly process Personal Data of a child in a manner that is likely to have detrimental effect on the well-being of such child.

If any person believes that Personal Data of a child or a person with disability has been submitted to Savex without valid parental consent, lawful guardian consent or lawful authorisation, such person may contact Savex at legal@savex.in. Upon receiving a verifiable request, Savex will take reasonable steps in accordance with applicable law, which may include deletion, restriction or correction of the relevant Personal Data, unless retention is required or permitted by law.

18. Marketing communications and opt-outs:

Savex may send business communications, event invitations, product updates, newsletters or marketing communications to business contacts where such communications are relevant to their role, organisation, expressed interest, existing business relationship or consent/preference status. Recipients may opt out of marketing emails by using the unsubscribe link, preference mechanism or by contacting Savex at legal@savex.in. Opting out of marketing communications will not affect transactional, legal, service, security or account-related communications that Savex is required or permitted to send. Savex may take a reasonable period to give effect to an opt-out request, during which some communications already in process may continue to be delivered.

19. Third-party websites, platforms and OEM links:

Savex website, communications or other contact points may contain links to third-party websites, OEM portals, partner platforms, event registration pages, social media pages, payment platforms or other external services. Such links may be provided for convenience, business reference, product information, transaction facilitation, event participation or partner/OEM coordination purposes only. Such third-party websites, platforms and services are governed by their own privacy notices, terms of use, cookie practices and security standards. Savex does not own, operate or control such third-party websites, platforms or services and shall not be responsible for their privacy practices, security standards, content, availability, accuracy, representations, acts, omissions or processing activities. Access to or use of any third-party website, platform, portal or service shall be at the user's own discretion and subject to the applicable terms, privacy notices and policies of such third party. Users are advised to review the applicable privacy terms and conditions before submitting any Personal Data or completing any transaction on such third-party website, platform or service. Savex's inclusion of any third-party link shall not, by itself, constitute an endorsement, representation, warranty, approval or assumption of responsibility by Savex in relation to such third party, its website, platform, services, privacy practices, security standards or processing of Personal Data.

20. Changes to this Policy:

Savex may amend, modify, supplement or update this Policy from time to time, at its sole discretion, to reflect changes in applicable law, regulatory requirements, business processes, technology, security practices, website functionality, internal policies, operational requirements, or the manner in which Personal Data is collected, used, disclosed, retained or otherwise processed. The “**Effective / Last updated date**” will be revised when the Policy is updated, and the updated Policy shall be effective from the date on which it is published, uploaded or otherwise made available by Savex, unless a different effective date is expressly stated. Data Principals, website users and business contacts are encouraged to review this Policy periodically, and continued access to or use of Savex's website, online forms, business contact points, or continued interaction with Savex after publication of the updated Policy shall mean that the relevant individual or Data Principal shall be governed by the updated Policy, to the extent permitted under applicable law.

21. Interpretation:

This Policy is to be interpreted in a manner consistent with applicable Indian law. If any provision of this Policy conflicts with a mandatory provision of applicable law, the mandatory legal provision will prevail to the extent of such conflict. References to the DPDP Act, DPDP Rules, Information Technology Act, 2000, rules made thereunder and any other law include any amendments, re-enactments, substitutions, notifications, directions or rules issued from time to time. Nothing in this Policy limits any rights available to a Data Principal under applicable law, nor does it restrict Savex from processing Personal Data where such processing is necessary, authorised, exempted or permitted under applicable law, court order, regulatory direction, statutory requirement, legal claim, security obligation or lawful business purpose recognised under applicable law.
