

Privacy Policy for Kula Conclave and Kula Innovate



200 Million Artisans % C-SHIFT LLP and/or its subsidiaries and affiliates hereinafter referred to as “200M”, (“We” or “Us” or “Our”) acknowledges and appreciates Users and Participants trust in us with respect to sharing their data. This notice describes Our privacy practices provided through the Website <https://www.kulaconclave.com/> (“Website”). By using the Website, the Users and Participants are accepting and consenting to the practices described in this Privacy Policy and they agree that we may collect, process and use the personal information listed below for the mentioned purposes.

This Privacy Policy has been drafted in accordance with the provisions of the Information Technology Act, 2000 and the Rules thereunder, including, without prejudice to the generality of the foregoing, the Information Technology “Reasonable security practices and procedures and sensitive personal data or information” Rules, 2011. Furthermore, the contents of this Policy are in compliance with the recommendations of the Report of the Group of Experts on Privacy, chaired by Justice A.P. Shah, dated October 16, 2012. The Report made certain recommendations and articulated nine ‘National Privacy Principles’, which are in line with the aforesaid Information Technology Act, 2000 and the Information Technology “Reasonable security practices and procedures and sensitive personal data or information” Rules 2011. A copy of the Report is available at <https://pib.gov.in/newsite/PrintRelease.aspx?relid=88503>, and we would urge you to read the Report if you so wish. For the purposes of convenience, the nine National Privacy Principles are reproduced here; should you feel that this Policy does not meet any of the standards set out in the National Privacy Principles, please contact us at: kula@200millionartisans.org and we will take the necessary steps to correct the mismatch between this Policy and the National Privacy Principles, if any.

This Privacy Policy has been divided into three parts; Part-A for the Users of Kula Conclave Event and allied activities and Part-B for Participants of Kula Innovate and a Common Part applicable to both Users and Participants.

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1. Controllers of Personal Information

Any personal information provided to or gathered by Us from the Users and Kula Innovate Participants under this Privacy Policy will be stored and controlled by Us (the data controller/data fiduciary). Such information shall be kept strictly confidential and shall not be communicated to any third parties unless communication to any such third party is strictly essential for the meeting of requirements of running this Website, or Kula Conclave and allied activities/events, or required by the law to do so. A data controller shall give Users and Kula Innovate Participants have the right to:

- **Access and Update:** Request access to and update your personal information.
- **Opt-Out:** Opt-out of receiving communications from us by following the unsubscribe instructions in our emails or contacting us directly.

Only after consent has been taken will the data controller collect, process, use, or disclose such information to third parties, except in the case of authorised agencies. The data subject shall, at any time while availing the services or otherwise, also have an option to withdraw his/her consent given earlier to the data controller. In such cases the data controller shall have the option not to provide goods or services for which the said information was sought if such information is necessary for providing the goods or services. In exceptional cases, where it is not possible to provide the service with choice and consent, then choice and consent should not be required. When provision of information is mandated by law, it should be in compliance with all other National Privacy Principles. Information collected on a mandatory basis should be anonymised within a reasonable timeframe if published in public databases. As long as the additional transactions are performed within the purpose limitation, fresh consent will not be required.

Part-A

1. What information do 'We' gather from Users?

Presently, whenever a User visits our Website we do not collect any Personal Information from them. In case any such User signs up for our newsletter services, or for Kula Conclave and allied activities including but not limited to Kula Innovate, under such circumstances we collect personal data as listed further in this agreement below.



The information gathered by us, from such Users, is strictly used to communicate with them and/or aid their participation in events . We also use this information to improve Users' experience while using this Website and provide them with results based upon their search history enabling us to provide such Users with a curated list of activities and information.

Additionally, personal information may be used to detect and prevent fraudulent practices and to enable third parties to carry out technical, logistical, payment processing or other functions on our behalf.

Here are the types of information we gather:

- A. **Information Users give Us:** We receive and store any information Users provide us while using the Website or give Us in any other way. Users can choose not to provide certain information, but then Users might not be able to use the Website. We use the information that Users provide for such purposes as communicating with Users, responding to Users' requests, and curating personalised information based upon such Users' preferences in line with the mission of 200M
- B. **Automatic Information:** We receive and store certain types of information whenever Users interact with us. For example, like many websites, we use “**cookies**”. We may also receive/store information about their location and their mobile device. We may use this information for internal analysis and to provide Users with location-based services, such as advertising, search results, and other personalised content. To know more about this, go through our **Cookie Policy**.
- C. **Our Communications with Users:** Among other things, we communicate with Users on a regular basis via email. We also use Users email addresses to send them notices in relation to their use of the Website, to send information about important changes to the Website, and to send notices and other disclosures required by law. Users agree to receive such communications electronically. We may send them promotional messages about activities or opportunities that may interest them. If Users do not want to receive such messages or other reminders and emails from us, they can choose to turn off the same.



Also, to help us make emails more useful and interesting, we may receive a confirmation when Users open or receive email from Us.

- D. **Information from Other Sources:** We might receive information about Users from third parties and add it to our account information. However, such information shall be held strictly confidential and not used without obtaining the prior consent of such User.

By using or continuing to use the Website, you agree to how we handle your information as described in this Privacy Policy. We may update this policy from time to time. You also agree to let us collect, store, use, and share your information (including sensitive details) with third parties or service providers as needed. This may include sharing your information with government authorities for identity verification or legal purposes, such as investigating cyber incidents or handling legal cases.

3. Do We share the information it receives from Users?

Information about our Users is highly confidential and we are not in the business of selling it to others. The Website is set up mainly to cater to Users and enable them to discover the various information and activities conducted by Us. Any changes to the same shall be contacted to Users and shall follow practices described in this Privacy Policy.

- **Third-party service providers:** Third party service providers are responsible for putting up advertisements related to jobs. In such cases, such third party service providers will collect information that may be of personal in nature. Under no circumstances shall We directly or indirectly have access to such information exchanged between such third party and User.
- **Protection of Us and Others:** We release account and other personal information when we believe release is appropriate to comply with the applicable laws; enforce or apply our Terms and Conditions, and other agreements or policies; or protect the rights, property, or safety of our business, our Users, or others. This includes exchanging information with other companies, organisations and government or regulatory authorities for fraud protection and credit risk reduction as well as sharing information with our attorneys, auditors and other representatives. However, this does not include selling, renting, sharing, or otherwise



disclosing personally identifiable information from customers for commercial purposes in violation of the commitments set forth in this Privacy Notice.

- **With Users' consent:** In case of situations other than as set out above, Users will receive notice when information about them might be required to be shared with third parties, and under such circumstances, such Users will have an opportunity to choose not to share the information.

4. How secure is information about Users ?

We work to protect the security of personal information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information that Users input in addition to maintaining security of their information as per the International Standard IS/ISO/IEC 27001 on "Information Technology Security Techniques Information Security Management System-Requirements". We restrict access to their personally identifiable information to employees who need to know that information in order to provide products or services to them. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal information (including sensitive personal information). Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to them.

5. What about third-party advertisers and links to other websites?

Our Website may put advertising and links to other websites. We do not provide any personally identifiable User information to these advertisers or third-party websites. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Notice. Please contact them directly for more information about their privacy practices.

6. Which information can Users access?

We allow Users, on written request, access to information about their account, and their interactions with us for the limited purpose of viewing and, in certain cases, updating that information.



Part-B- Kula Conclave and Kula Innovate Form

1. Information We Collect:

When you complete our form, we may collect the following types of personal information:

- **Contact Information:** such as name, email address, phone number.
- **Demographic Information:** such as age, gender, location.
- **Other Information:** any other details you provide in the form.

2. How We Use Your Information

We use the information collected through our form for the following purposes:

- **To Process Requests:** To respond to your inquiries or requests.
- **To Improve Our Services:** To understand your needs and enhance our offerings.
- **To Communicate:** To send updates, newsletters, or other relevant information (if you have opted in).

3. Sharing Your Information:

We do not sell, trade, or otherwise transfer your personal information to outside parties except in the following circumstances:

- **With the 200M Community:** We may share the information provided by you in aggregate with resource partners within our community for selections as part of Kula Kula Conclave and allied activities, including but not limited to Kula Innovate, however, identifiable information will be treated as completely confidential and will not be put forth in the public domain.
- **With Service Providers:** We may share your information with trusted third-party service providers who assist us in operating our website or conducting our business, subject to confidentiality agreements.



- **For Legal Reasons:** If required by law, to comply with legal processes, or to protect our rights and safety.

4. Data Security:

We implement appropriate security measures to protect your personal information from unauthorised access, alteration, disclosure, or destruction. However, no method of transmission over the Internet or electronic storage is 100% secure, so we cannot guarantee absolute security.

5. Your Choices

You have the right to:

- **Access and Update:** Request access to and update your personal information.
- **Opt-Out:** Opt-out of receiving communications from us by following the unsubscribe instructions in our emails or contacting us directly.

6. Cookies and Tracking Technologies

Our website may use cookies and similar tracking technologies to enhance your experience. You can set your browser to refuse cookies or to alert you when cookies are being sent.

7. Changes to This Privacy Policy:

We may update this Privacy Policy from time to time. Changes will be posted on this page with an updated effective date. We encourage you to review this policy periodically.

8. Which information can Users and Participants access and delete ?

All information that Users and Participants share is strictly as per the requirements in the forms filled through our Website or emailed directly by Us to Users and Participants, solely for the purpose of the event, Kula Conclave and allied activities including Kula Innovate. If Users and/or Participants want to request the deletion of any information that is with Us, they may do so by sending us a written request at kula@200millionartisans.org.



Common Part

1. What about Cookies?

Cookies are alphanumeric identifiers that we transfer to Users and Participants' computers' hard drives through Users and Participants' web browsers to enable our systems to recognise their browsers so we can recognise them and if they return to use the Website using the same computer and browser, and to provide features such as Recommended for Users and Participants, or personalised advertisements on other websites/applications. Users and Participants can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on settings or visiting the website of its manufacturer. However, Users may lose the ability to utilise some of the features, and we recommend that they leave cookies turned on.

2. Are minors allowed to access this Website?

Our website is strictly for Users and Participants, who have attained the age of 18 or are declared as major by the law of the country they are based in.

3. User agreement, notices and revisions

If Users and Participants choose to use our Website, their use and any dispute over privacy is subject to this Privacy Policy, the applicable end-Users agreement and any service terms, if applicable, including limitations on damages and application of the law of India.

Our coverage and services will expand, and our Privacy Policy will change also. We may email Users and Participants with periodic reminders of our notices and conditions. Users and Participants should check our Website frequently to see recent changes. Unless stated otherwise, our current Privacy Policy also applies to all information that we have about them and their account.

4. Data Protection



- a. **Data Collection and Use:** We collect and use your personal data in accordance with applicable data protection laws. This includes information you provide when you use our website, such as your name, email address, and any other details you choose to share.
- b. **Data Security:** We implement reasonable measures to protect your personal data from unauthorised access, use, or disclosure. While we strive to safeguard your information, we cannot guarantee complete security due to the inherent risks of online data transmission.
- c. **Data Sharing:** We do not sell or rent your personal data to third parties. We may share your data with trusted service providers who assist us in operating our website, but only to the extent necessary for their services and under confidentiality agreements.
- d. **Your Rights:** You have the right to access, correct, or delete your personal data. If you wish to exercise these rights or have any concerns about how we handle your data, please contact us using the details provided below.
- e. **Changes to This Clause:** We may update this Data Protection clause from time to time. Any changes will be posted on our website with the updated date.

5. Grievances

Users and Participants can register their grievances at the contact section of the Website, or they can email us at kula@200millionartisans.org and they will be put in touch with our support team.

