

PRIVACY POLICY

Last modified: January 17, 2024

Introduction

AutoSoft Dynamics (Private) Limited ("**Company**," "**Us**," "**Our**," or "**We**") respects Your privacy and is committed to protecting it through Our compliance with this Privacy Policy. Please read this Privacy Policy carefully to understand Our policies and practices regarding the Personal Information We collect from You, how We use it, how We share it, Your rights and choices, and how You can contact Us about Our privacy practices. To the extent that You are an End User or a Visitor, this Privacy Policy also outlines Your rights as a data subject, including the right to object to some uses of Your Personal Information by Us.

This Privacy Policy applies to Personal Information We collect about You from various sources, as further described in the "*Personal Information We Collect and How We Collect It*" section below.

Definitions

"**Affiliate**" means any entity that now or hereafter (i) directly or indirectly owns or controls, is owned or controlled by, or is under common ownership or control with a Us, and (ii) is under common management with Us.

"**B2B Party**" means a customer, supplier, vendor, or business partner (any of which can be a sole proprietorship or a formal legal entity) with whom We have a business relationship and who directly or indirectly provides Us with B2B Representative and/or End User Personal Information in connection with those B2B Representatives' or End Users' use of Our Products or otherwise.

"**B2B Representative**" refers to individuals who work for or on behalf of a B2B Party, or in the event that the B2B Party is a sole proprietorship, the B2B Representative is the sole proprietor.

"**End User**" means individuals who do business with, or otherwise interact with, a B2B Party but who are not doing business with Us directly.

"**Personal Information**" means any information that identifies or relates to an individual or can be used in conjunction with other information to identify an individual, whether such information is explicitly regulated by applicable law or otherwise.

"**Processing**" means any operation or set of operations which is performed on Personal Information, encompassing the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction or erasure of Personal Information. The terms "Process", "Processes" and "Processed" will be construed accordingly.

"**Product(s)**" means the products and services that We offer, including, but not limited to, software, software-as-a-service, support/maintenance, professional services, and hosting services.

"**Visitor**" means (i) any individual that visits the Website, including a B2B Representative or End User, or (ii) anyone that otherwise communicates with the Company is not a B2B Representative or End User. For the sake of clarity, a B2B Representative or End User that visits the Website shall only be deemed a Visitor with respect to their activities while visiting the Website.

"**Website**" means any publicly accessible website hosted by or on behalf of the Company which is not part of a Product.

"**You**" and "**Your**" mean B2B Party, B2B Representative, End User, or Visitor, depending on the context as further explained in this Privacy Policy, and if there is no context which specifically identifies any of the foregoing, then "You" or "Your" means all of the foregoing collectively.

Scope, Generally (Controller vs. Processor)

Our Role as a Processor

Generally speaking and without regard to any particular definition under applicable law, We are a data processor ("**Processor**") when We do not determine the purpose and means of Processing the Personal Data of B2B Representatives and End Users, and We only Process that Personal Information in accordance with the specific instructions of a B2B Party, as is the case when We Process Personal Information only as necessary to provide Our Products to a B2B Party. We receive instructions from B2B Parties through agreements We have with those B2B Parties, including any ancillary data privacy agreements or addenda (collectively a "**B2B Agreement**"). This Privacy Policy does not apply when We Process Personal Information as a Processor.

When You are a B2B Party and We act as a Processor with respect to the Personal Information that We receive from You or on Your behalf, You alone are responsible for providing appropriate privacy notices and disclosures to Your B2B Representatives

and End Users with respect to Your Processing of their Personal Information. You cannot rely on this Privacy Policy as a means for satisfying Your privacy notice and disclosure obligations.

When You are a B2B Representative or an End User and We act as a Processor with respect to Your Personal Information, the B2B Party with whom You have a relationship is responsible for providing appropriate notices and disclosures to You about how they Process Your Personal Information and You must refer to that B2B Party's privacy policy or other notices for information regarding their privacy practices, Your rights, and how You exercise those rights.

Our Role as a Controller

Generally speaking and without regard to any particular definition under applicable law, We are a data controller ("**Controller**") when We determine the purpose and means of Processing the Personal Information of B2B Representatives and End Users, as is the case when a B2B Party permits Us to Process that Personal Information in ways that relate to Our Products but are not strictly necessary in order to perform those Products. This Privacy Policy only applies when We Process Personal Information as a Controller.

When You are a B2B Party and We act as a Controller with respect to the Personal Information that We receive from You or on Your behalf pursuant to a B2B Agreement, We are responsible for providing appropriate privacy notices and disclosures to Your B2B Representatives and End Users with respect to Our Processing of their Personal Information as a Controller. However, pursuant to the B2B Agreement, You agree to comply with all applicable laws, including those which may require You to provide notice to or gain consent from Your B2B Representatives and End Users prior to giving Us permission to Process that Personal Information as a Controller. Specifically, You and Your legal advisors should consider whether You need to list Us in Your privacy policy and notify Your End Users of Our privacy practices by linking to this Privacy Policy.

When You are a B2B Representative or an End User and We act as a Controller with respect to Your Personal Information, this Privacy Policy describes Our privacy practices, including the Personal Information We collect from You, how We use it, how We share it, Your rights and choices, and how You can contact Us about Our privacy practices. However, as mentioned in the "Our Role as a Processor" section above, You must refer to the privacy notices and disclosures of the B2B Party with whom You have a relationship for more information regarding that B2B Party's privacy practices, including any notices or disclosures with respect to that B2B Party's transfer of Your Personal Data to Us for Our Processing as a Controller.

When You are a Visitor, We are a Controller with respect to Your Personal Information. We Process Your Personal Information in accordance with this Privacy Policy and any other agreement We may have directly with You. This Privacy Policy describes Our privacy practices, including the Personal Information We collect from You, how We use it, how We share it, Your rights and choices, and how You can contact Us about Our privacy practices.

<u>Categories and Types of Personal Information We Collect</u>	<u>Sources From Which We Collect Your Personal Information</u>
Identifiers , including real name, postal address, phone number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	<ul style="list-style-type: none">• From a B2B Party with whom You are employed or otherwise do business.• From You directly when You provide it to Us through communications or otherwise.• From Your use of the Products• Third-Party channel partners• From Our Affiliates• From publicly available sources
Internet or other similar network activity , including information on Your interaction with an application or advertisement	
Geolocation data , including imprecise physical location derived from IP address and/or wifi networks	

Professional or employment-related information , including place of employment, position, and other related data	
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Personal Information We Collect and How We Collect It

For B2B Representatives

When You are a B2B Representative, We collect the following Personal Information about You from the following sources:

For End Users

When You are an End User, We collect the following Personal Information about You from the following sources:

<u>Categories and Types of Personal Information We Collect</u>	<u>Sources From Which We Collect Your Personal Information</u>
Identifiers , including real name, postal address, phone number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	<ul style="list-style-type: none"> • From a B2B Party with whom You do business, or otherwise interact. • From You directly when You provide it to Us through communications or otherwise. • From Your use of the Products
Internet or other similar network activity , including information on Your interaction with an application	
Geolocation data , including imprecise physical location derived from IP address and/or wifi networks	

For Visitors

When You are a Visitor, We collect the following Personal Information about You from the following sources:

<u>Categories and Types of Personal Information We Collect</u>	<u>Sources From Which We Collect Your Personal Information</u>
Identifiers , including real name, postal address, phone number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	<ul style="list-style-type: none"> • From You directly when You provide it to Us through communications or otherwise. • From Your use of Our Website, including collection via cookies and other automated data collection technologies. • From Our Affiliates • Third-Party channel partners
Internet or other similar network activity , including browsing history; search history; and information on a Your interaction with a website, application, or advertisement	
Geolocation data , including imprecise physical location derived from IP address and/or wifi networks	

How We Use and Disclose Your Personal Information

For B2B Representatives

When You are a B2B Representative, We Process Your Personal Information described below for the following purposes and based on the following legal bases:

<u>Categories and Types of Personal Information</u>	<u>Purpose for Processing</u>
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<p>Identifiers, including real name, postal address, phone number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name</p>	<ul style="list-style-type: none"> • To answer Your questions, handle complaints, and otherwise communicate with You, including receiving feedback on Our Product through surveys or otherwise • To provide the Products and process Your orders for Products • To create and distribute marketing or promotional materials • To debug, troubleshoot, or verify or maintain the quality or safety of the Products • To perform administrative functions with respect to the Products, including but not limited to maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytics services, providing storage, or providing other similar services • To undertake internal research and analytics for product development and demonstration • To conduct audits related to: <ul style="list-style-type: none"> ○ a B2B Party's compliance with its contractual obligations; and ○ compliance with laws and regulations that are applicable to You and Us • To prevent fraud or misuse of the Products • To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data
<p>Internet or other similar network activity, including information on Your interaction with an application or advertisement</p>	<ul style="list-style-type: none"> • To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data • To undertake internal research and analytics for product development and demonstration • To debug, troubleshoot, or verify or maintain the quality or safety of the Products
<p>Geolocation data, including imprecise physical location derived from IP address and/or wifi networks</p>	<ul style="list-style-type: none"> • To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data • To undertake internal research and analytics for product development and demonstration
<p>Professional or employment-related information, including place of employment, position, and other related data</p>	<ul style="list-style-type: none"> • To supplement Our records regarding who is authorized to access a B2B Party's Products • To prevent fraud or misuse of the Products

When You are a B2B Representative, We disclose Your Personal Information described below to the following categories of third-parties and for the following purposes:

<u>Categories and Types of Personal Information</u>	<u>Categories of Parties to Whom We Disclose the Information</u>	<u>Purpose for <i>Disclosing</i></u>
Identifiers , including real name, postal address, phone number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	<ul style="list-style-type: none"> • Service Providers/Vendors 	<ul style="list-style-type: none"> • To answer Your questions, handle complaints, and otherwise communicate with You, including receiving feedback on Our Product through surveys or otherwise • To provide the Products and process Your orders for Products • To create and distribute marketing or promotional materials • To debug, troubleshoot, or verify or maintain the quality or safety of the Products • To perform administrative functions with respect to the Products, including but not limited to maintaining or servicing Your accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytics services, providing storage, or providing other similar services • To undertake internal research and analytics for product development and demonstration • To improve or upgrade the Products • To prevent fraud or misuse of the Products
	<ul style="list-style-type: none"> • Prospective customers/Visitors 	<ul style="list-style-type: none"> • To provide marketing or promotional material, including testimonials and references
Internet or other similar network activity , including information on Your interaction with an application or advertisement	<ul style="list-style-type: none"> • Service Providers/Vendors 	<ul style="list-style-type: none"> • To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data • To undertake internal research and analytics for product development and demonstration
Geolocation data , including imprecise physical location derived from IP address and/or wifi networks	<ul style="list-style-type: none"> • Service Providers/Vendors 	<ul style="list-style-type: none"> • To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data

		<ul style="list-style-type: none"> To undertake internal research and analytics for product development and demonstration
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For End Users

When You are an End User, We Process Your Personal Information described below for the following purposes and based on the following legal bases:

<u>Categories and Types of Personal Information</u>	<u>Purpose for Processing</u>
Identifiers , including real name, postal address, phone number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	<ul style="list-style-type: none"> To improve or upgrade the Products To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data To undertake internal research and analytics for product development and demonstration
Internet or other similar network activity , including information on Your interaction with an application	<ul style="list-style-type: none"> To improve or upgrade the Products To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data To undertake internal research and analytics for product development and demonstration
Geolocation data , including imprecise physical location derived from IP address and/or wifi networks	<ul style="list-style-type: none"> To improve or upgrade the Products To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data To undertake internal research and analytics for product development and demonstration

When You are an End User, We disclose Your Personal Information described below to the following categories of third-parties and for the following purposes:

<u>Categories and Types of Personal Information</u>	<u>Categories of Parties to Whom We Disclose the Information</u>	<u>Purpose for Disclosing</u>
Identifiers , including real name, postal address, phone number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	<ul style="list-style-type: none"> Service Providers/Vendors 	<ul style="list-style-type: none"> To improve or upgrade the Products To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data To undertake internal research and analytics for product development and demonstration
Internet or other similar network activity , including information on Your interaction with an application	<ul style="list-style-type: none"> Service Providers/Vendors 	<ul style="list-style-type: none"> To improve or upgrade the Products To create deidentified or anonymized data based Your Personal

		<p>Information, which is then aggregated with other data</p> <ul style="list-style-type: none"> To undertake internal research and analytics for product development and demonstration
<p>Geolocation data, including imprecise physical location derived from IP address and/or wifi networks</p>	<ul style="list-style-type: none"> Service Providers/Vendors 	<ul style="list-style-type: none"> To improve or upgrade the Products To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data To undertake internal research and analytics for product development and demonstration

For Visitors

When You are a Visitor, We Process Your Personal Information described below for the following purposes and based on the following legal bases:

<u>Categories and Types of Personal Information</u>	<u>Purpose for Processing</u>
<p>Identifiers, including real name, postal address, phone number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name</p>	<ul style="list-style-type: none"> To answer Your questions, handle complaints, and otherwise communicate with You To reach out to You in response to an inquiry about Our Products To improve or upgrade the Website To send You marketing messages or promotional materials from Us To prevent fraud or misuse of the Website To facilitate contact from B2B Representatives for referral purposes.
<p>Internet or other similar network activity, including browsing history; search history; and information on a Your interaction with a website, application, or advertisement</p>	<ul style="list-style-type: none"> To operate, improve or upgrade the Website using cookies To send You marketing messages or promotional materials from Us To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data To undertake internal research and analytics for product development and demonstration
<p>Geolocation data, including imprecise physical location derived from IP address and/or wifi networks</p>	<ul style="list-style-type: none"> To answer Your questions, handle complaints, and otherwise communicate with You To prevent fraud or misuse of the Website To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data

	<ul style="list-style-type: none"> To undertake internal research and analytics for Website development and demonstration
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When You are a Visitor, We disclose Your Personal Information described below to the following categories of third-parties and for the following purposes:

<u>Categories and Types of Personal Information</u>	<u>Categories of Parties to Whom We Disclose the Information</u>	<u>Purpose for Disclosing</u>
Identifiers , including real name, postal address, phone number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	<ul style="list-style-type: none"> Service Providers/Vendors 	<ul style="list-style-type: none"> To improve or upgrade the Website To answer Your questions, handle complaints, and otherwise communicate with You To create deidentified or anonymized data based Your Personal Information, which is then aggregated with other data To undertake internal research and analytics for Website development and marketing To perform services for Us, including prospect tracking and communication To prevent fraud or harm to Us or others
	<ul style="list-style-type: none"> B2B Representatives 	<ul style="list-style-type: none"> To facilitate contact from B2B Representatives for referral purposes
Internet or other similar network activity , including browsing history; search history; and information on a Your interaction with a website, application, or advertisement	<ul style="list-style-type: none"> Service Providers/Vendors 	<ul style="list-style-type: none"> To improve the Website, analyze Our performance, and learn about customer trends and interests
Geolocation data , including imprecise physical location derived from IP address and/or wifi networks	<ul style="list-style-type: none"> Service Providers/Vendors 	<ul style="list-style-type: none"> To prevent fraud or harm to Us or others To undertake internal research and analytics for Website development and marketing

Aggregated, Deidentified, and Anonymized Data

We create aggregated, deidentified, or anonymized data derived from Our use of Your Personal Information, and such data can be used by Us as permitted by applicable laws and regulations. We will not attempt to re-identify the data.

Other Purposes for Processing and Disclosing Your Personal Information

We may also Process and disclose Your Personal Information:

- To competent public authority, government, regulatory or fiscal agency where it is necessary to comply with any court order, law, or legal process, including to respond to any government or regulatory request.

- To enforce or exercise Our rights under any agreement which governs Your relationship with Us, including Our rights under any such agreements that may be exercised for billing and collection purposes.
- If We believe disclosure is necessary or appropriate to protect Our rights, property, or safety, Our customers, or others. This may include the exchange of information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- Subject to some restrictions under applicable laws, We may transfer, whether for consideration or otherwise, Your Personal Information as an asset that is part of a bankruptcy, merger, or other similar transaction involving all or any portion of Our business. Any such transfer does not affect Your rights under any applicable laws.

Information We Collect Through Automatic Data Collection Technologies

As You navigate through and interact with Our Website, We may use automatic data collection technologies to collect certain information about Your equipment, browsing actions, and patterns, including:

- Information about your estimated location as may be determined from the IP Address;
- Information about the device you are using, such as:
 - Internet Protocol (or IP) address or device ID/UDID, protocol and sequence information;
 - Browser language and type; and
 - Hardware model, operating system, application version number, device or browser data;
- Domain name system requests;
- Browsing history, time spent at a domain, time and date of your visit, number of clicks, or location data; and
- HTTP headers, application client and server banners.

The information We collect automatically does, in some cases, include Personal Information, or We may maintain it or associate it with Personal Information We collect in other ways or receive from third parties. These activities help Us improve Our Website and Products and deliver a better and more personalized experience, including by enabling Us to:

- Estimate Our audience size and usage patterns;
- Store information about Your preferences, allowing Us to customize Our Website according to Your individual interests;
- Speed up Your searches; and
- Recognize You when You return to Our Website.

The technologies We use for this automatic data collection may include:

- *Cookieless Tracking Technology.* When You visit Our Website, Our Website runs a script that stores information about how You interact with the Website. The script only runs while You are visiting the Website, and will not persist when You leave the Website.
- *Cookies.* When You visit our Website, a “cookie” may be sent to Your computer. A cookie is a small piece of data that is sent to Your Internet browser from a web server and stored on your computer’s hard drive. When You visit the Website again, the cookie allows the Website to recognize Your computer. Cookies may store user preferences and other information to assist Your navigation between pages efficiently, remember preferences, and improve the user experience. You can choose whether to accept cookies by changing Your Internet browser settings, which may impair or limit some functionality of the Website.
 - Cookies can be “persistent” or “session” cookies. Persistent cookies remain on Your personal computer or mobile device when You go offline, while session cookies are deleted as soon as You close Your web browser.
 - We use first party cookies, which are cookies that We place on Your device ourselves, and third party cookies, which are cookies that We allow third parties to place on Your device.

You may leverage any of the methods identified in the “*Contact Information*” section below to contact us about Our use of cookies.

Third-Party Use of Cookies and Other Tracking Technologies

As previously mentioned, some content or applications, including advertisements, on the Website are served by Our third-party service providers. These third parties may use cookies, alone or in conjunction with web beacons or other tracking technologies such as pixels, to collect information about You when You use Our Website. They may use this information to provide Us with Website analytics with respect to Your use of the Website.

As mentioned previously, You may leverage any of the methods identified in the “*Contact Information*” section below to contact us about Our use of cookies.

International Data Transfers

In order to carry out the Processing activities described above, We may make use of subcontractors that act on Our behalf as Processors. These subcontractors will be contractually obligated by Us to Process Your Personal Information only in accordance with Our instructions, only for the purposes described above, and only for the period of time necessary to preform those purposes.

In some cases, these subcontractors may be located outside of the data privacy jurisdiction in which You reside. In the event such international data transfers are necessary, We will take the necessary organizational, technical and contractual measures to ensure the protection of Your Personal Information. In certain situations, We may be required to disclose Personal Information in response to lawful requests from law enforcement and national security authorities of that jurisdiction.

For questions or comments about our practices with respect to international data transfers, please refer to the “*Contact Information*” section at the end of this Privacy Policy.

Consequences of Not Providing Your Personal Information

Personal Information gathered by Us for the purposes defined in this Privacy Policy may be required by Us, either directly or indirectly, in order for Us maintain a relationship with You; therefore, Your failure to provide Us with Your Personal Information may negatively affect Our ability to:

- Provide the Products to You and fulfill Our contractual obligations with You;
- Fulfill legal requirements;
- Enter into a contract with related parties and continuing to contract with those related parties; or
- Maintain contact with You.

Data Security and Storage

We have implemented technical, administrative, and physical security measures that are designed to protect Your Personal Information from unauthorized access, disclosure, use, and modification. Such measures include the encryption of sensitive information. We regularly review Our security procedures to consider appropriate new technology and methods. Even so, please be aware that no security measure is perfect. Thus, We cannot guarantee the security of Your Personal information at all times. You should always be vigilant when it comes to the protection of Your Personal Information.

Retention Period

Subject to any opt-out rights You may have and all applicable laws, We retain Your Personal Information for only as long as reasonably necessary to carry out the purposes for which We originally collected it, as set forth in this Privacy Policy. Notwithstanding the foregoing, we may continue to retain Your Personal Information to comply with our legal and regulatory obligations; to enable fraud monitoring, detection and loss prevention activities; to comply with our tax, accounting, and financial reporting obligations; and where required by our contractual commitments to third-parties. The retention period may also depend on the terms of any B2B Agreement we have with a B2B Party.

Children Under the Age of 16

Our Website and Products are not intended for children under 16 years of age. You may not knowingly or unknowingly provide Us Personal Information of minors under 16 years of age through Your use of the Website or Products. We do not knowingly collect Personal Information from children under 16. We do not sell or share Personal Information of children under age 16. No one under age 16 may provide any Personal Information to Us. If You are under 16, do not use or provide any Personal Information on Our Website or through Our Products. If We learn We have collected or received Personal Information from a child under 16 without verification of parental consent, We will delete that information. If You believe We might have any information from or about a child under 16, please contact Us using the Contact Information provided at the end of this Privacy Policy.

Changes to Our Privacy Policy

We reserve the right to amend this Privacy Policy at Our discretion and at any time. When We make changes to this Privacy Policy, We will post the updated Privacy Policy on the Website and update the Privacy Policy's effective date. The date the Privacy Policy was last revised is identified at the top of the page. If You would like Us to notify You of any changes to this Privacy Policy, You must ensure We have an up-to-date, active, and deliverable email address for You; otherwise, You are responsible for periodically visiting Our Website and this Privacy Policy to check for any changes.

Contact Information

To ask questions, or comment about this Privacy Policy and Our privacy practices, or for any other privacy-related inquiries, please:

Email Us at support@autosoftdynamics.com

Write Us at the following postal address:

AutoSoft Dynamics (Private) Limited
Attn: Privacy Officer
360/2 Q, Commercial Area, D.H.A.
Lahore – 54792, Pakistan