

## Privacy Statement

Ayvens India Private Limited (“Ayvens”) is committed to protecting the privacy of personal information collected and processed by us. Compliant privacy and data security practices are therefore integral components of Ayvens provided services, corporate governance, accountability and risk management and overall accountability. This privacy statement informs you of our privacy practices which we apply. Please read this Privacy Statement carefully so that you understand how we collect and use your personal data.

In general, you can visit/ browse our website without providing your personal identification, where it is practical. We process your personal data provided by you voluntarily during your visits to our website, in accordance with the applicable laws of India. Certain sections of the website may require your personal data in order to cater for your needs efficiently and to provide better information in relation to the products, services or information as may be requested by you on our website. Therefore, by accessing and using our website or using our services, you unconditionally accept the terms and conditions of this Privacy Statement and voluntarily accord your unambiguous consent to authorize Ayvens to collect, use and process all information and personal data provided by you on the website in accordance with this Privacy Statement.

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## 1. Scope of this Privacy Statement

This Privacy Statement explains what personal data we collect, why we collect it, how we use it, how long we retain it, and the rights you have in relation to your personal data.

We collect and process your personal data in the course of providing vehicle leasing and fleet management services to you in India in accordance with this Statement. Additionally, this Statement applies to all personal data which we collect while your visit to our website and process it for legitimate purposes including but not limited to:

- Prospective and current customers and lessees;
- Drivers and authorised users of leased vehicles;
- Employees and contractors of customers to the extent their personal data is processed for fleet services;
- Vendors and service providers;
- Visitors to our websites and digital platforms
- Prospective employment opportunities

(or prospects/visitors in relation to above Individually and collectively also referred to as “**you**”)

## 2. Who we are

Ayvens (“we”, “us”, “our”) provides vehicles on operating lease and fleet management services and has its registered office at 4<sup>th</sup> Floor, D Wing, Jolly Board Tower, I-Think Techno Campus, Kanjurmarg (East), Mumbai, Maharashtra, India, 400042 and shall be the company responsible for the processing of your personal information (data controller)

We are committed to protecting the privacy of individuals whose personal data we collect and process in accordance with the applicable laws including but not limited to Digital Personal Data Protection Act, 2023 (“DPDPA”), amendments and its applicable rules thereto.

We may share your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 2 of the Indian Companies Act, 2013. We may also share personal information with recoveries agents,

debt collectors, legal advisors, fin-tech partners, credit bureau, insurance companies, third party service providers and similar organizations, either of which may in such cases act as a joint Data Fiduciary:

We may disclose your personal information to third parties. In the event that we decide to sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets, if necessary, post execution of required documents to maintain confidentiality of your personal information.

### **3. When we collect Personal Data:**

We collect your Personal Data that means any information or data that identifies or can identify an individual, directly or indirectly such as your name, age, gender, mailing address, telephone number and e-mail address, zip code, phone number, location data, etc.

We collect your Personal Data which you provide us, inter alia, in scenarios such as-

- (i) While your visit to our website
- (ii) When you connect your social media account to your Services account or where you share information from our websites to your social media platforms;
- (iii) your response to our online surveys;
- (iv) in case you register for events conducted or sponsored by us;
- (v) your request about information related to our services or request for customer support;
- (vi) when you visit our kiosk at some offline events, place an order over the phone, or contact customer service; or
- (vii) when registering for availing our services, etc.
- (viii) when you request for service or to handle queries, questions, comments, complaints raised by you related to our Services,
- (ix) When you apply for a job or other staffing opportunity through this site.

Not all of the Personal Data that Ayvens holds about you, will always come directly from you. It may, for example, come from:

- (i) your employer or other organizations to which you belong;
- (ii) through our network of preferred partners or retailers;
- (iii) joint marketing partners, when they share the information with us;
- (iv) the traffic authorities in case of breach of traffic laws;

- (v) our independent Service Partners who assist us in providing our leasing and other services to you, including car dealerships, car maintenance providers, body repair shops;
- (vi) publicly available databases, credit reference agencies and other sources
- (vii) when you report a problem with this site or services offered on this

If you decide to avail our services, depending on the service and context, we may collect the following categories of personal data:

- (i) **Identity and contact:** name, date of birth, gender, photograph, PAN/Aadhar, email address, postal address, telephone number.
- (ii) **KYC & Verification:** identity documents, driving license, vehicle registration documents, corporate identity documents for businesses.
- (iii) **Contract & transactional:** contract details, billing & payment information, TIN/GSTIN (where applicable), bank details for refunds/settlements.
- (iv) **Operational & telematics:** vehicle location, GPS, vehicle usage logs, mileage, accident reports, vehicle condition, fuel consumption.
- (v) **Employment & driver data:** employment details, emergency contacts, licenses, background & verification data
- (vi) **Support & communications:** customer care records, complaints, call recordings, emails.
- (vii) **Device & online:** IP address, cookies, device identifiers, usage analytics

#### 4. Why we process your data

Ayvens collects and processes personal data about you when you interact with this website to carer to your requirement efficiently and to provide you personalised experience. Most of the data we process is in relation to the vehicle leasing and fleet management services. which we provide to you as the driver/user and to your employer if you are using a company vehicle. This starts with the registration of the leased vehicle (depending upon the service you choose, we may conduct preliminary credit checks before this) and continues when we communicate with you about our services, e.g. to arrange for periodic maintenance and repairs. We may also process your data when your vehicle inadvertently is involved in an accident, to ensure that we restore mobility and handle any damage, or where we are the recipient of traffic fines in relation to your leased vehicle. Next to our core-leasing activities, we may provide other related value-

added services, such as fuel card services, roadside assistance, etc. Another service we provide relates to car remarketing and sale of used Ayvens vehicles.

## **5. For which purposes, we use your data:**

- (i) to handle day-to-day management and administration of your accounts (if you become our client), such as maintaining contracts, and keep you informed of all important developments concerning the Services and other information which is relevant for the client contract and account. This processing is based on the performance of the lease agreement that we have with you or based on a legal obligation.
- (ii) To send you surveys, for which we have legitimate interest to process these data.
- (iii) when you visit us on our premises for the purpose of ensuring appropriate access controls and security, for which we have legitimate interest (safety and security of our assets).
- (iv) For providing you access to the online reporting tool “My Ayvens Fleet” or any other tool to log onto these tools to review the status of their fleet, damage reporting, contract management and to use other fleet reporting functionalities, such as dashboard reporting, trend analysis reporting, vehicle mileage and end of lease term. This processing is based on our legitimate interest and relates to the performance of the lease agreement that we have with our client.
- (v) To resolve your questions and complaints, to work on your suggestions, or to provide you a quote for our Services as requested by you.
- (vi) To contact you when you complete a survey on our websites, for feedback on our websites and/or Services with your consent or for which we have legitimate interest to process these data.
- (vii) For analysis of data collected via our website for the purpose including but not limited to type of service requested, frequency of visitors, etc.
- (viii) To analyze Personal Data which is collected using our digital media and combine it with information collected via cookies. Any processing of your personal information via cookies and/or similar technologies will take place in accordance with our Cookie Statement available on the link below: <https://www.ayvens.com/en-in/cookie-policy/>

## **6. Third Party data provided by you:**

If you disclose any personal information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Statement.

## **7. Monitoring of communications:**

Subject to applicable laws, we will monitor and record calls, email, text messages and other communications we have with you. We do this for compliance with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communication systems and procedures, and for quality control and staff training purposes. For example, where we are required by a regulator to record certain telephone lines (as relevant) we will do so. In addition, where appropriate and having regard to applicable data protection law, our monitoring will be to check for inappropriate content in communications. In very limited and specific circumstances we may conduct short term carefully controlled monitoring of your activities where this is necessary for our legitimate interests or to comply with a legal obligation. We may do this for instance where we have reason to believe that fraud or other crime is being committed, where offences are suspected and where the monitoring is proportionate to the type of the disciplinary offence, or where we suspect non-compliance with anti-money laundering regulations to which we are subject. In particular, telephone calls may be recorded for these purposes.

## **8. Sharing data with third parties**

In addition to what is indicated for each purpose above regarding sharing of personal information, we may also share personal information:

- (i) Within the Ayvens group for the purposes described in this Statement.
- (ii) To our third-party service partners, providers, to facilitate services they provide to you and us.

In order to provide you with our services, we often work closely with Service Partners and Service Providers. Our independent Service Partners assist us in providing our leasing and other services to you, and include car dealerships, car maintenance providers, body repair shops, and roadside assistance providers, but also rental service companies, and the administrators of our driver safety programs. Car dealerships or suppliers of (electric) vehicles may require contact details of a driver to activate a personal account necessary to be set up as a driver, otherwise the vehicle does not work.

Service Providers are companies we retain that support us in running our business, for example to help us maintain our IT network and related infrastructure, and security and access controls

to our premises. We also use and disclose your personal information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

(iii) To comply with applicable law and regulations. -

This will include laws applicable to India.

(iv) To cooperate public and government authorities.

-To respond to a request or to provide information we believe is important

-These can include authorities outside your country of residence.

(v) To cooperate with law enforcement.

For example, when we respond to law enforcement requests and orders or provide information we believe is important.

(vi) For other legal reasons.

-To enforce our terms and conditions; and

-To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

**(viii) In connection with a sale or business transaction.**

We have a legitimate interest in disclosing or transferring your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings) Such third parties may include, for example, an acquiring entity and its advisors.

## **9. Third Party Links:**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements and practices they follow to protect the Personal Data and you may decide to visit the same with your own wisdom and risk. This Privacy Statement does not apply to information that is collected on such third party website(s) and we shall not be held liable for any breach by such third party website(s)

## **10. International transfer of personal data**

Due to the global nature of our organization and Services, we may process, store, and retain your Personal Data on its servers where the data centres are located, and/ or on the servers of third parties having contractual relationships with it. We do not transfer any Personal Data to such a country or territory outside India as restricted by the Government.

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## **11. Security and retention**

### How we secure personal data

We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization.

Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us through this [contact form](#).

### How long we retain personal data

We will retain your personal information for as long as necessary or permitted in light of the purposes for which it was collected and to meet legal, regulatory, contractual, tax or accounting obligations. Unless a longer retention is required by law or a regulator, Ayvens will retain

personal data for up to eight (8) years from the end of the relationship or until the purpose for which the personal data was collected has been fulfilled, whichever is earlier.

The criteria used to determine our retention periods include:

(i) The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you use an AYVENS vehicle).

(ii) Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them);  
or

(iii) Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations). After the retention period expires, personal data will be securely deleted. This retention approach is in line with the DPDPA and Rules' purpose-based requirements.

## **12. Your Rights and Withdrawing consent**

You have the right to withdraw your consent for the processing of your Personal Data at any time. This withdrawal will not affect the lawfulness of processing of your Personal Data based on your consent obtained before its withdrawal. You can exercise this right by contacting our Data Protection Officer (DPO) at [grievance@aldautomotive.com](mailto:grievance@aldautomotive.com). Upon withdrawal of the consent, you understand and agree that you may not be eligible to avail our services from the date of such withdrawal.

For marketing communications, you can opt-out at any time. Ayvens will then cease sending marketing materials. Your personal data may still be retained for product related transactions, or legal obligations, as described in this Statement.

To exercise your rights, including withdrawal, please contact us at [grievance@aldautomotive.com](mailto:grievance@aldautomotive.com)

Withdrawal of consent be as easy as giving consent. Upon receipt of a valid- withdrawal request, Ayvens will:

- Cease processing personal data for the relevant purpose(s) that relied on consent, unless another lawful ground for processing exists; and
- Delete Personal Data, unless retention is required to comply with legal, regulatory, contractual, or statutory obligations.

### 13. Data Breach & Notification

If a data breach occurs that is likely to cause harm to you, we will follow legal requirements to notify you and the relevant authorities in accordance with the DPDPA and Rules. We will also take appropriate steps to mitigate harm and remediate the incident.

### 14. Children's privacy

Our Services are not directed at individuals under the age of 18.

### 15. Your rights and contacting us

If you would like to request to review, correct, update, suppress, restrict or delete your personal information processed by us, please reach out to us [here](#).

In your request, please make as clear as possible what personal information your request relates to. For your protection, we will only implement requests with respect to the personal information associated with the particular email address as you indicated in the contact form, and we may request you to provide verification of your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in any event within any applicable legally required time frames.

Please note that we may need to retain certain information for record keeping purposes and/or to complete any transactions that began prior to requesting such change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

*Questions?* If you have any questions or complaints about this Statement, please contact us by filling this [contact form](#). Because email communications are not always secure, please do not include sensitive information in your emails to us.

**Data Grievance Officer** Any questions, inquiries, discrepancies, and grievances of the Relevant Individuals with respect to processing of Personal Data may be made to Ayvens Data Grievance Officer. In accordance with the Indian Information Technology Act 2000 and the Rules notified thereunder, the contact details of the Data Grievance Officer are provided below: Name of Data Grievance Officer: Sunil Rajgor AYVENS India Private Limited, Jolly Board, Tower 1, D-Wing, 4th

Floor, I-Think Techno Campus, Kanjurmarg East, Mumbai- 400042 Maharashtra, India E-mail: [grievance@aldautomotive.com](mailto:grievance@aldautomotive.com) Phone: 1800 209 5253

In case your grievance is not resolved within 30 days by Data Grievance Officer, you may approach Data Protection Board of India.

## **16. Changes to this Privacy Statement**

We reserve the right to change or update this Statement at any time without any notice. Please take a look at the “Last Updated” legend at the top of this page to see when this Statement was last revised. Any changes to this Statement will become effective when we post the revised Statement on the Services.