

LAXMI-M

PRIVACY POLICY

Issued on: 15th April, 2024

1. INTRODUCTION

Hello! Laxmi Astrochat is a company that develops the software based on technology and spirituality to its users. We've developed this Privacy Notice ("**Notice**") to explain to you how we collect, use, disclose, and store personal data.

In this policy, "we", "us", "our" and "Laxmi Astrochat" or Laxmi chat AI or "Laxmi Astrochat AI" refer to Maa Laxmi Concept Solutions Private Limited. For more information about us please contact at support@laxmiastrochat.ai

We respect your privacy and are committed to protect it by complying the mandatory and obligatory laws, rules, guidelines in order to protect the interest of our users, investors and stakeholders.

This privacy policy (Policy) applies when you visit or register or interact or enquire with the Laxmi Astrochat AI, the mobile applications and the website, our branded social media pages, and other Sites which we operate (collectively, our "**Digital Properties**"); we are acting as a data controller (meaning where Laxmi Astro-chat-ai controls how and why your personal data is processed) with respect to the personal data of our users. This Policy describes how we collect, use and share personal data of consumer users across our websites, including www.laxmiastrochat.ai (the **Website**), Laxmi Astro-chat-ai mobile application (the **App**) and services offered to users (collectively with the Website and the App, the **Services**), and from our partners and other third parties. When using any of our Services you consent and agree to the collections, transfers, storage, disclosures, and use of your personal data as described in this Policy.

This Policy does not apply to anonymised data, as it cannot be used to identify you.

Please read this Policy carefully to understand our policies and practices regarding your personal data and how we will treat it. By accessing or using the Services, you agree to this Policy. Our Services also incorporates privacy controls which affect how we will process your personal data. Please refer to

Section 5 for a list of rights with regard to your personal data and how to exercise them.

This Policy may change from time to time with and without intimations. Your usage of the Services shall be deemed acceptance of the changes made in the policy and you are required to read this policy from time to time.

2. PERSONAL DATA WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

There are three categories of the data which we may collect from you:

❖ INFORMATION PROVIDED BY THE USERS:

- We collect your account data, which may include personal identification information such as your name, date of birth, age, nationality, gender, photographs, mobile number, address/ location and/ or place of birth, and/or email address, and formal identification information such as PAN/ Tax ID number, UIDAI/ Aadhar Number, passport number, driver's license details, national identity card details, photograph identification cards, and/or visa information or QR details (collectively, **Account Data**). The Account Data may be processed for the purposes of providing to you our Services, satisfying anti-money laundering and know-your-customer obligations, and ensuring the security of the Services, maintaining back-ups of our databases and communicating with you. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested Services.
- We process financial information such as bank account, credit card or debit card, upi details or such other financial information when you order Services in order to facilitate the processing of payments (**Payment Information**). The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our mobile application/ website and business.
- We may process information contained in or relating to any communication that you send to us (**Correspondence Data**). The Correspondence Data may include the communication contents or such other information as may be disclosed by you for the purpose of use of

our app or website. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our mobile application/ website and business and communications with users.

- We may process information included in your personal profile, which may include your location, time zone and website (**Profile Data**). The Profile Data may be processed for the purposes of providing you a better user experience when using the Services. The legal basis for this processing is your consent.

❖ **INFORMATION WE AUTOMATICALLY COLLECT FROM YOUR USE OF THE SERVICES:**

When you use the Services, we may automatically process information about your mobile application and internet connection (including your IP address, operating system and browser type), your mobile carrier, device information (including device and application IDs), search terms, cookie information, as well as information about the timing, frequency and pattern of your service use, and information about the transactions you make on our Services, such as the name of the recipient, your name and timestamp (**Service Data**).

The data which we collect may be categorised as under:

Information you provide to us directly, including when you register and communicate with us directly through our Digital Properties, visit our offices, or participate in our events, marketing, and outreach activities.

Information collected from your employer, coworkers, or friends, including information about representatives or other employees of our current, past, and prospective customers, suppliers, investors, and business partners. We may also receive your information from a friend as part of a referral for our Services.

Information automatically collected, including technical information about your interactions with our Digital Properties (such as IP address, browsing preferences, and purchase history).

Information from public sources, including information from public records and information you share in public forums, such as social media.

Information from other third parties, including information from third-party service and content providers, entities with whom we partner to sell or promote products and services, and social media networks (including widgets related to such networks, such as the “Facebook Like” button etc).

We may combine information that we receive from the various sources described in this Notice, including third-party sources and public sources, and use or disclose it for the purposes identified above.

The Service Data is processed for the purpose of providing our Services. The legal basis for this processing is the adequate performance of the contract between you and us, to enable us to comply with legal obligations and our legitimate interest in being able to provide and improve the functionalities of the Services.

❖ **INFORMATION WE COLLECT FROM THIRD PARTIES:**

We may from time to time, obtain information about you from third party sources as required or permitted by applicable law, such as public databases, UIDAI authority, ID verification partners (Governmental and non-governmental both), re-sellers and channel partners, joint marketing partners, and social media platforms, social media content creators. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, date of birth, sex, place of birth, address, status on any sanctions lists maintained by public authorities, and other relevant data. We obtain such information to comply with our legal obligations, such as anti-money laundering laws. The legal basis for the processing such data is compliance with legal obligations.

3. DISCLOSURE OF PERSONAL DATA

3.1 We may disclose your personal data to any member of our group/ associates partners/ service providers, specialists, consultants, companies or any other interested Company belonging to our group or business units, and other companies that we acquire in the future after they are made part of the Laxmi Astro Chat or Service providers, such as security and platform vendors or

Business partners who we partner with to jointly market or sell our products and Services, such as channel partners or security and platform vendors or With third parties at your direction, such as event sponsors or Professional advisors, such as astro/ taro/ vastu consultants, lawyers, accountants, and auditors or Entities involved in a corporate transaction, including if we sell, acquire, or merge all or some of our assets or Companies that operate Cookies and Tracking Technologies, such as marketing and advertising partners insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.

3.2 We may disclose Service Data to a variety of third-party service providers that are necessary to complete a transaction, such as credit card processors insofar as reasonably necessary to improve the functionalities of the Services. For example, we may disclose Service Data to obtain useful analytics, provide in-app support to mobile app users, determine location data and provide search engine functionality to our users.

3.3 We may share aggregated data (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

3.4 In the event of a dispute in P2P transaction, we may disclose some of your Personal Data with the counterparty to such transaction to the extent we deem required, in our discretion, to resolve the dispute.

3.5 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; or in order to protect your vital interests or the vital interests of another natural person; to protect the safety or integrity of the Services, or to explain why we have removed content or accounts from the Services; or to address fraud, security, or technical issues; or to protect our rights or property of those who use the Services.

3.6 We offer individuals the opportunity to choose (opt out) whether their personal information is (i) to be disclosed to a third party or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individuals. In order to

opt out from disclosure of your personal information, please write to us at support@laxmiastrochat.ai

4. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

We provide information about the circumstances in which your personal data may be transferred to countries outside the country. To facilitate our operations we may transfer, store, and process your information within those countries or with service providers based in India or outside India. Laws outside India may differ from the laws applicable to our Country. For example, information collected within the India may be transferred, stored, and processed outside of the India for the purposes described in this Privacy Policy. Where we transfer store, and process your personal information outside of the India we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection.

Transfers to our affiliated entities, to our service providers and other third parties will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by any government regulation or guidelines etc.

5.YOUR RIGHTS WITH REGARD TO PERSONAL DATA

In this Section 5, we have summarized the rights that you have under data protection law based on whether you are a resident or you are not a resident of India. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

5.1 Non- India Residents. If you are a Non- India Resident, you may access and verify your Personal Information held by Laxmi Astrochat AI by submitting a written request to us at support@laxmiastrochat.ai

5.2 Indian Residents. If you are an Indian Resident, your principal rights under data protection law are:

- (a)the right to access;
- (b)the right to rectification;
- (c)the right to erasure;
- (d)the right to restrict processing;
- (e)the right to object to processing;

- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to refuse or withdraw consent.
- (i) the right to not be subject to Automated Decision-making

5.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data, if needed and justified request received from you. The first information will be provided free of charge, but additional information may be subject to a reasonable fee. You can access your personal data by writing to us at support@laxmiastrochat.ai.

5.4 You have the right to have any inaccurate personal data about you be rectified and, taking into account the purposes of the processing, to have any incomplete personal data be completed by providing additional/ requisite information/ documents. You can request correction or modification of your personal data by writing to us at : support@laxmiastrochat.ai

5.5 In some circumstances, as an Indian Resident, you have the right to erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw your consent to consent-based processing; you object to the processing under certain rules of applicable data protection law, if any; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims. You can request the deletion of your account by writing to us at: support@laxmiastrochat.ai.

5.6 In some circumstances, as an Indian Resident, you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

5.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

5.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

5.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

5.10 To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, and you are an UAE Resident or not, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others. You can request to download your account information, by writing to us at : support@laxmiastrochat.ai

5.11 To the extent that the legal basis for our processing of your personal data is consent and you are an Indian Resident, you have the right to withdraw that

consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

5.12 You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 5.

You may exercise these rights by contacting us using the details provided in 11 below. Please note that we may refuse to act on requests to exercise data protection rights in certain cases, such as where providing access might infringe someone else's privacy rights or impact our legal obligations.

6. RETAINING AND DELETING PERSONAL DATA

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your information to provide the Services to you, you can request that we erase your personal information and close your account.

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7.CHILDREN'S PRIVACY

Our Sites and Services are not directed to children under the age of 18, and we do not knowingly collect online personal data directly from children. You must also be old enough to consent to the processing of your personal data in the country without parental consent. No one under age 18 may provide any personal data through the Services. If you are under 18, do not use or provide any information through the Services or on or through any of their features or register an account, make any purchases through the Services, use any of the

interactive features of the Services or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If you are a parent or guardian of a minor child and believe that the child has disclosed online personal data to us please do write to us using the details provided in 11 below.

8.COOKIES

8.1 About cookies

(a) A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

(b) Cookies may be either persistent cookies or session cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

(c) Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

(d) We also use other technologies with similar functionality to cookies, such as web beacons, web storage, and unique advertising identifiers, payment gateway information to collect information about your activity, browser, and device.

8.2 We use these technologies for the following purposes:

- (a) to identify you and log you into the Services;
- (b) to store information about your preferences and to personalise the Services for you;
- (c) as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (d) to help us display content that will be relevant to you;
- (e) to help us analyse the use and performance of the Services; and
- (f) to store your preferences in relation to the use of cookies more generally.

8.3 Cookies used by our service providers

(a) We use the service providers to analyse the use of the Services. Each service provider gathers information about the Services by means of cookies and this information is used to create reports about with usage information. You

can find information about the service providers privacy policies and practices by making a request in this regard to us:

8.4 Managing cookies

(a) Most browsers allow you to refuse to accept cookies and to delete cookies, while some browsers have incorporated Do Not Track or DNT preferences, we do not honor such signals from web browsers at this time. The methods for doing so vary from browser to browser, and from version to version and it totally depends on you that how and which browser you are using.

(b) Your mobile device/ PC may allow you to control cookies through its settings function. Refer to your device manufacturers instructions for more information.

(c) If you choose to decline cookies, some parts of the Services may not work as intended or may not work at all.

9. DATA SECURITY

9.1 We maintain appropriate security procedures and technical and organizational measures to protect your personal data against accidental or unlawful destruction, loss, disclosure, alteration, or use and we have implemented measures designed to secure your personal data from accidental loss and from unauthorized access, use, alteration and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

9.2 Steps taken to ensure data security:

(a) All the user information can only be accessed by authorized users;

(b) Users need to authenticate themselves with a username-password combination and a One-Time password, if prompted; and

(c) All data shall be hosted on servers maintained by the Company at www.laxmiastrochat.ai or such other website as may be decided by the Company.

9.3 Unfortunately, the transmission of information via public networks such as the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted through the Services. Any transmission of personal data is at your

own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the Services.

9.4 Your personal data will be generally retained as long as necessary to fulfill the purposes for which we collected the personal data. Once you and/or your company have terminated the contractual relationship with us or otherwise ended your relationship with us, we may retain your personal data in our systems and records to ensure adequate fulfillment of surviving provisions in terminated contracts or for other legitimate business purposes, such as to evidence our business practices and contractual obligations, to provide you with information about our products and services, or to comply with applicable legal, tax, or accounting requirements. When we have no ongoing legitimate business need nor lawful legal ground to process your personal data, we will delete, anonymize, or aggregate it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible. If you want to know more about retention periods applicable to your particular circumstance, please contact us by placing a request in this regard.

10.CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our Policy on this page. If we make material changes to how we treat our users' personal data, we will notify you by e-mail to the primary e-mail address specified in your account if the same is felt necessary by the management of the service provider or otherwise you can always refer this section by visiting to our website. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this Policy to check for any changes. If you do not agree with any changes we make, you should stop interacting with us. When required under applicable law, we will notify you of any changes to this Notice by posting an update on our Site or in another appropriate manner.

11. CONTACT INFORMATION

The data controller responsible for your personal data is Laxmi Astrochat. Please write to us at support@laxmiastrochat.ai

12. SUPPLEMENTAL INFORMATION FOR OTHER REGIONS

Australia: Personal data collected, stored, used, and/or processed by the Laxmi Astrochat, as described in this Notice, is collected, stored, used, and/or processed in accordance with the Australian Privacy Act 1988 (Commonwealth) and the Australia Privacy Principles. If you are dissatisfied with our handling of a complaint or do not agree with the resolution proposed by us, you may make a complaint to the Office of the Australian Information Commissioner (“**OAIC**”) by contacting the OAIC using the methods listed on their website. Alternatively, you may request that we pass on the details of your complaint to the OAIC directly.

Brazil: Personal data collected, stored, used, and/or processed by the Laxmi Astrochat, as described in this Notice, is collected, stored, used, and/or processed in accordance with Lei Geral de Proteção de Dados (“**LGPD**”). Those individuals who use or access our Sites or Services expressly consent to the collection, use, storage, and processing of their personal data by us for the purposes described in this Notice.

Canada: Personal data, as defined in the Personal Information Protection and Electronic Documents Act (“**PIPEDA**”) will be collected, stored, used, and/or processed by the Laxmi Astrochat in accordance with the Laxmi Astrochat’s obligations under PIPEDA.

Japan: Personal data collected, stored, used, and/or processed by the Laxmi Astrochat, as described in this Notice, is collected, stored, used, and/or processed in accordance with Japan’s Act on the Protection of Personal Information (“**APPI**”).

Nevada: We do not presently sell personal data as defined under Nevada law. If you are a Nevada resident, you may nevertheless email us using the information above to exercise your right to opt-out of sale under Nevada Revised Statutes §603A.

New Zealand: Personal data collected, stored, used, and/or processed by the Laxmi Astrochat, as described in this Notice, is collected, stored, used, and/or processed in accordance with New Zealand’s Privacy Act 2020 and its 13 Information Privacy Principles (“**NZ IPPs**”).

Singapore: Personal data collected, stored, used and/or processed by the Laxmi Astrochat, as described in this Notice, is collected, stored, used, and/or

processed in accordance with the Laxmi Astrochat's obligations under the Personal Data Protection Act 2012 ("PDPA").

United Kingdom: Personal data collected, stored, used, and/or processed by the Laxmi Astrochat, as described in this Privacy Notice, is collected, stored, used, and/or processed in accordance with the Laxmi Astrochat's obligations under the UK Data Protection Act 2018, as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019, as amended, superseded or replaced ("**U.K. GDPR**").

European Economic Area, the United Kingdom, and Switzerland

If you are a data subject in the European Economic Area, the United Kingdom, or Switzerland, you have certain rights with respect to your personal data pursuant to the General Data Protection Regulation of the European Union ("GDPR") and similar laws. This section applies to you.

References to "personal information" in this Policy are equivalent to "personal data" as defined under GDPR.

Laxmi Astrochat is the controller of your personal information as covered by this Policy for purposes of GDPR. Our address is as follows:

H No. K-6, Sales Tax Colony, Shankar Nagar, Raipur Chhattisgarh 492001 India

We process your personal data in reliance on the legal basis below. Where the purpose of processing is:

To provide and improve the Interfaces and the Features: We process your personal data as necessary to provide the Interfaces and the Features to you.

To comply with the law: We process your personal data as necessary to comply with applicable laws and our legal obligations.

For compliance, fraud prevention, and safety: We have a legitimate interest in processing your personal data, as described in this Policy, and our reasons for doing so outweigh any prejudice to your data protection rights. We also process your personal data as necessary to comply with our legal obligations.

To send marketing communications; or for research and analytics: We have a legitimate interest in processing your personal data, as described in this

Policy, and our reasons for doing so outweigh any prejudice to your data protection rights.

With your consent: We process certain of your personal data with your consent. You may withdraw your consent at any time in the manner indicated when you provided consent to the collection of your personal data through your interactions with the Site.

You may: (i) ask whether we have any personal data about you and request a copy of such personal data; (ii) request that we update or correct inaccuracies in your personal data; (iii) request that we delete your personal data; (iv) request a portable copy of your personal data; (v) request that we restrict the processing of your personal data if such processing is inappropriate; and (vi) object to our processing of your personal data. These rights are subject to applicable law.

If you would like to exercise any of these rights, please contact us (see “Contact Us” section above). To protect your information, we may need to verify your identity before processing your request, including by collecting additional information to verify your identity, such as government issued identification documents.

If you would like to submit a complaint about our use of your personal data or our response to your requests regarding your personal data, please Contact Us above. You may also lodge a complaint with your local data protection authority.

To the extent we transfer your personal data outside the European Economic Area, we will do so in accordance with the terms of this Policy and applicable data protection law.

13. ENGLISH VERSION CONTROLS

Non-English translations of this notice, if any are provided for convenience only. In the event of any ambiguity or conflict between translations, the English version is authoritative and controls.

*****END*****