

TAKSHAY LABS PRIVATE LIMITED

Privacy & Data Protection Policy

Issued by

Takshay Labs Private Limited

Registered Office:

No. 3, 6th B Main Road, N S Palya
BTM Layout, Bengaluru Urban
Karnataka 560076, India

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This document follows the Takshay brand system. Refer to Takshay colour codes and typography standards where styling is applied.

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1 Definitions

In this Policy, unless the context otherwise requires, the following terms shall have the meanings ascribed to them herein:

"Act" means the Digital Personal Data Protection Act, 2023, as amended or re-enacted from time to time, together with all rules, regulations, and notifications issued thereunder.

"Company", "we", "us", or "our" means Takshay Labs Private Limited, a company incorporated under the Companies Act, 2013, having its registered office at No. 3, 6th B Main Road, N S Palya, BTM Layout, Bengaluru Urban, Karnataka 560076, India.

"Consent" shall have the meaning assigned under Section 6 of the Act, namely a free, specific, informed, unconditional, and unambiguous indication of the Data Principal's agreement to the processing of their Personal Data for a specified purpose.

"Data Fiduciary" shall have the meaning assigned under the Act, and in the context of this Policy refers to Takshay Labs Private Limited, being the entity that determines the purpose and means of processing Personal Data.

"Data Principal" shall have the meaning assigned under the Act, and refers to the natural person to whom the Personal Data relates.

"Data Processor" shall have the meaning assigned under the Act, and refers to any person who processes Personal Data on behalf of the Data Fiduciary.

"Personal Data" shall have the meaning assigned under the Act, and refers to any data about an individual who is identifiable by or in relation to such data.

"Policy" means this Privacy and Data Protection Policy, as amended from time to time.

"Processing" shall have the meaning assigned under the Act, and refers to a wholly or partly automated operation or set of operations performed on Digital Personal Data, including collection, recording, organisation, structuring, storage, adaptation, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure, or destruction.

"Website" means the official website operated by the Company, accessible at www.takshay.in, and any subdomains, microsites, or digital platforms operated by the Company.

2 Identity of the Data Fiduciary

Pursuant to Section 8 of the Digital Personal Data Protection Act, 2023, Takshay Labs Private Limited is identified as the Data Fiduciary with respect to the Personal Data collected and processed through the Website and any associated digital touchpoints.

The Company's registered particulars are as follows:

- Name: Takshay Labs Private Limited
- Registered Office: No. 3, 6th B Main Road, N S Palya, BTM Layout, Bengaluru Urban, Karnataka 560076, India
- Email: privacy@takshay.in

The Company hereby affirms its commitment to process Personal Data in accordance with the Act and in a fair, lawful, and transparent manner.

3 Scope and Applicability

3.1 This Policy applies to all natural persons who interact with the Website, including but not limited to visitors, enquirers, prospective clients, and any other individuals whose Personal Data is collected, processed, or stored by the Company in connection with the Website.

3.2 This Policy does not apply to:

- Information that has been anonymised or aggregated in a manner that does not permit identification of any individual;
- Information relating to corporate entities or legal persons, to the extent that such information does not pertain to identifiable natural persons;
- Personal Data processed by third-party websites, platforms, or services that may be linked from the Website, which are governed by their own privacy policies.

3.3 This Policy is to be read in conjunction with the Terms of Use of the Website and any other applicable policies published by the Company.

3.4 This Policy shall apply to the processing of Personal Data whether carried out within the territory of India or outside India, where such processing involves Personal Data of Data Principals located in India, in accordance with the provisions of the Act.

4 Personal Data Collected

4.1 Voluntarily Submitted Data

The Company may collect Personal Data that is voluntarily provided by the Data Principal through the use of contact forms, enquiry submissions, newsletter subscriptions, or other interactive features of the Website. Such data may include, but is not limited to:

- Full name
- Email address
- Organisation or employer name
- Phone number or mobile number
- Nature of enquiry or message content
- Any other information voluntarily submitted by the Data Principal

The Company affirms that the collection of such data is limited to what is necessary for the purposes stated in Section 6 of this Policy, in accordance with the principle of data minimisation.

4.2 Automatically Collected Data

When a Data Principal accesses the Website, certain technical and navigational data may be automatically collected by the Company or its authorised technology service providers. Such data may include:

- Internet Protocol (IP) address
- Browser type and version
- Operating system and device type
- Pages visited and time spent on pages
- Referring URL or source of website access
- Date and time of access

Such automatically collected data is primarily used for the administration, security, and improvement of the Website, and for the measurement of website performance and usage patterns.

4.3 Data Not Collected

The Company does not intentionally collect sensitive personal data as defined under applicable law, including but not limited to financial credentials, biometric data, health information, or government identification numbers, through the Website. In the event any such data is inadvertently received, the Company shall delete the same without retention.

5 Cookies and Tracking Technologies

5.1 The Website may employ cookies and similar tracking technologies, including web beacons and pixel tags, for the purposes of improving website functionality, understanding usage patterns, and delivering a consistent user experience.

5.2 A cookie is a small text file placed on the Data Principal's device upon accessing the Website. The following categories of cookies may be used:

Cookie Category	Purpose	Consent Required
Strictly Necessary	Essential for website operation; cannot be disabled.	No
Analytics	Used to measure website usage, traffic sources, and user interaction patterns.	Yes
Functional	Used to remember user preferences and deliver enhanced functionality.	Yes

5.3 Upon first accessing the Website, the Data Principal will be presented with a cookie consent notice. Data Principals may accept or reject non-essential cookies through the cookie preference panel available on the Website. Withdrawal of consent may be effected at any time through the said panel, without prejudice to the lawfulness of processing prior to such withdrawal.

5.4 The Data Principal may also manage cookie preferences through the settings of their browser. However, disabling certain cookies may affect the functionality of features of the Website.

6 Purpose Limitation

The Company hereby affirms that Personal Data collected through the Website shall be processed solely for the following specified and lawful purposes:

- Responding to enquiries, requests, or communications submitted by Data Principals through the Website;
- Facilitating business correspondence and follow-up communications in connection with services offered by the Company;
- Administering and maintaining the technical operation, security, and integrity of the Website;
- Analysing website usage patterns for the purpose of improving website functionality and user experience;
- Complying with applicable legal obligations under the Act, the Information Technology Act, 2000, or any other law for the time being in force;
- Sending informational communications, including updates regarding the Company's services or publications, subject to the Data Principal's consent where required;
- Detecting, investigating, and preventing fraudulent or unauthorised activity on the Website.

The Company shall not process Personal Data for any purpose that is incompatible with the purposes stated herein without obtaining fresh consent from the Data Principal, unless permitted under applicable law.

7 Lawful Bases for Processing

Subject to the provisions of the Act, the Company processes Personal Data on the following lawful bases:

7.1 Consent

Where the processing of Personal Data is based on consent, the Company shall obtain the consent of the Data Principal prior to such processing, in accordance with Section 6 of the Act. Consent shall be sought in a clear, plain, and intelligible manner, and shall be specific to the purpose for which it is sought.

7.2 Legitimate Use for Specified Purposes

Pursuant to Section 7 of the Act, the Company may process Personal Data without consent in the following circumstances:

- For the compliance of any legal obligation applicable to the Company under any law for the time being in force in India;
- For the compliance of any judgment or order, including orders under any contract, issued under any law for the time being in force;
- For responding to a medical emergency involving a threat to the life or immediate threat to the health of the Data Principal or any other individual;
- For taking measures to provide medical treatment or health services during an epidemic, outbreak of disease, or any other threat to public health;
- For taking measures to ensure safety of, or provide assistance or services to, any individual during any disaster or breakdown of public order;
- For the purposes of employment or related activities, to the extent permitted under the Act.

7.3 Processing for Legal Compliance

The Company may process Personal Data to the extent required to comply with applicable legal obligations, including obligations imposed by the Act, the Information Technology Act, 2000, and any rules, regulations, or orders thereunder.

8 Consent and Withdrawal

8.1 Where the processing of Personal Data is predicated on consent, the Company shall ensure that:

- The request for consent is presented in plain and intelligible language;
- The request identifies the Data Fiduciary, the purpose of processing, and the manner in which the Data Principal may withdraw consent;
- Consent is not bundled with other terms and conditions as a condition of service unless the processing is strictly necessary for that service;
- A record of consent is maintained by the Company in accordance with applicable law.

8.2 A Data Principal may withdraw consent for the processing of their Personal Data at any time by:

- Submitting a written withdrawal request to the Grievance Officer at privacy@takshay.in;
- Using the cookie preference management panel available on the Website, where consent relates to cookie-based processing.

8.3 The Company hereby affirms that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

8.4 Upon receipt of a valid withdrawal request, the Company shall cease processing the relevant Personal Data within a reasonable period, and shall delete or anonymise such data, except where retention is required by applicable law or for the establishment, exercise, or defence of legal claims.

9 Protection of Children's Data

9.1 The Website is not directed at, and does not knowingly collect Personal Data from, children below the age of eighteen (18) years, as defined under the Act.

9.2 Pursuant to Section 9 of the Act, the Company shall, before processing Personal Data of a child, obtain verifiable consent from the parent or lawful guardian of such child.

9.3 The Company shall not process Personal Data of a child in a manner that is likely to cause any detrimental effect on the well-being of such child, and shall not undertake tracking or behavioural monitoring of children or targeted advertising directed at children.

9.4 In the event the Company becomes aware that Personal Data has been inadvertently collected from a minor without verified parental consent, the Company shall take immediate steps to delete such data from its records.

9.5 Data Principals who have reason to believe that a child has submitted Personal Data through the Website without appropriate consent should contact the Grievance Officer at privacy@takshay.in.

10 Data Sharing and Third-Party Processors

10.1 The Company hereby affirms that it does not sell, rent, or otherwise commercially trade Personal Data with third parties.

10.2 The Company may share Personal Data with authorised third-party Data Processors engaged to provide technical, operational, or administrative services in connection with the Website. Such Data Processors may include:

- Cloud infrastructure and hosting service providers responsible for the storage and operation of the Website and its backend systems;
- Analytics service providers engaged for the purpose of measuring website usage and performance;
- Email delivery platforms used to communicate responses to enquiries or informational communications;

- Cybersecurity and monitoring service providers engaged to maintain the security and integrity of the Website.

10.3 All third-party Data Processors engaged by the Company shall be subject to contractual obligations requiring them to process Personal Data solely in accordance with the instructions of the Company, to maintain appropriate technical and organisational security measures, and to comply with applicable data protection law.

10.4 The Company may also disclose Personal Data:

- Where required to do so by applicable law, court order, or direction of a competent regulatory authority;
- Where necessary to protect the rights, property, or safety of the Company, its users, or the public;
- In connection with any merger, acquisition, restructuring, or corporate transaction involving the Company, subject to appropriate confidentiality undertakings.

11 Cross-Border Data Transfers

11.1 The Company's Website may be hosted on cloud infrastructure operated by third-party service providers whose servers may be located outside the territory of India. Where Personal Data is transferred to or processed in a foreign jurisdiction, such transfer shall be effected in accordance with the provisions of Section 16 of the Act and any rules or frameworks notified by the Central Government thereunder.

11.2 The Company shall ensure that any cross-border transfer of Personal Data is subject to appropriate contractual safeguards and that the receiving party in the foreign jurisdiction is subject to data protection obligations equivalent to those required under the Act.

11.3 The Company shall maintain records of cross-border data transfers to the extent required under applicable law, and shall cooperate with the Data Protection Board of India in accordance with its statutory obligations.

12 Data Security

12.1 Pursuant to Section 8(4) of the Act, the Company shall implement and maintain appropriate technical and organisational measures to protect Personal Data against unauthorised access, disclosure, alteration, loss, or destruction. Such measures shall include, but are not limited to:

- Encryption of Personal Data in transit using Transport Layer Security (TLS) protocols;
- Encryption of Personal Data at rest where technically feasible and appropriate;
- Role-based access controls restricting access to Personal Data to authorised personnel on a need-to-know basis;
- Deployment of secure cloud infrastructure that complies with recognised security standards;
- Regular review and testing of security measures and security controls;
- Employee awareness and training on data protection obligations.

12.2 The Company acknowledges that no method of transmission over the internet or method of electronic storage is wholly secure, and accordingly cannot guarantee absolute security. However, the Company shall use commercially reasonable efforts to protect Personal Data in its custody.

12.3 The Company shall ensure that any Data Processor engaged by it has implemented comparable security standards, and shall include appropriate contractual provisions to that effect.

13 Data Retention

13.1 The Company shall not retain Personal Data beyond the period necessary for the purposes for which it was collected, or as required by applicable law. Upon the expiry of the applicable retention period, Personal Data shall be deleted or anonymised in a secure manner.

13.2 The following retention schedule shall apply to Personal Data processed by the Company:

Category of Personal Data	Retention Period
Enquiry form data (name, email, organisation, phone, message)	2 years from date of collection, or withdrawal of consent, whichever is earlier.
Analytics and usage data (IP address, browser type, pages visited)	12 months from date of collection.
Cookie preference records	12 months or until consent is withdrawn.
Communications and grievance records	3 years from date of resolution or closure.

13.3 Notwithstanding the foregoing, the Company may retain Personal Data for a longer period where:

- Retention is required to comply with a legal obligation applicable to the Company;
- Retention is necessary for the establishment, exercise, or defence of legal claims;
- Retention is required pursuant to any order of a court or competent regulatory authority.

14 Personal Data Breach Notification

14.1 In the event of a Personal Data breach, the Company shall take prompt remedial action to contain, investigate, and mitigate the impact of the breach.

14.2 Pursuant to Section 8(6) of the Act and such rules as may be prescribed thereunder, the Company shall, upon becoming aware of a Personal Data breach, notify the Data Protection Board of India and affected Data Principals in the prescribed manner and within the prescribed timelines.

14.3 The notification provided to the Data Protection Board and to affected Data Principals shall, to the extent known at the time of notification, include the following:

- The nature of the Personal Data breach, including the categories and approximate number of Data Principals affected;
- The likely consequences of the breach;
- The measures taken or proposed to be taken to address the breach and mitigate its adverse effects;
- Contact information of the Grievance Officer from whom further information may be obtained.

14.4 The Company shall maintain a record of all Personal Data breaches, irrespective of whether notification to the Data Protection Board was required under applicable law.

15 Rights of Data Principals

Subject to the provisions of the Act and any applicable exceptions thereunder, Data Principals have the following rights with respect to their Personal Data processed by the Company:

15.1 Right of Access

Pursuant to Section 11 of the Act, a Data Principal has the right to obtain from the Company a summary of the Personal Data being processed by the Company and the processing activities undertaken with respect to such data.

15.2 Right to Correction and Erasure

Pursuant to Section 12 of the Act, a Data Principal has the right to correct, complete, update, or erase their Personal Data where such data is inaccurate, incomplete, or no longer necessary for the purpose for which it was collected.

15.3 Right of Grievance Redressal

Pursuant to Section 13 of the Act, a Data Principal has the right to readily available means of grievance redressal in respect of any act or omission of the Data Fiduciary regarding the performance of its obligations under the Act.

15.4 Right to Nominate

Pursuant to Section 14 of the Act, a Data Principal has the right to nominate another individual who shall, in the event of the death or incapacity of the Data Principal, exercise the rights of the Data Principal under the Act.

15.5 Right to Withdrawal of Consent

As described in Section 8 of this Policy, a Data Principal has the right to withdraw consent for the processing of their Personal Data at any time, subject to the conditions set out therein.

15.6 Exercise of Rights

Data Principals may exercise any of the foregoing rights by submitting a written request to the Grievance Officer at the contact details specified in Section 16 of this Policy. The Company shall respond to all legitimate requests within such period as may be prescribed under applicable law.

16 Grievance Redressal Mechanism

16.1 The Company has designated a Grievance Officer to address complaints and queries of Data Principals in relation to the processing of their Personal Data. The details of the Grievance Officer are as follows:

- Designation: Grievance Officer (Data Protection)
- Organisation: Takshay Labs Private Limited
- Email: privacy@takshay.in
- Address: No. 3, 6th B Main Road, N S Palya, BTM Layout, Bengaluru Urban, Karnataka 560076, India
- Business Hours: Monday to Friday, 10:00 a.m. to 6:00 p.m. IST (excluding public holidays)

16.2 Any Data Principal who has a grievance regarding the collection, storage, processing, or disclosure of their Personal Data by the Company may submit a written complaint to the Grievance Officer at the contact details specified above.

16.3 The Grievance Officer shall acknowledge receipt of the complaint within such period as may be prescribed under applicable law and shall endeavour to resolve the complaint expeditiously.

16.4 In the event the Data Principal is dissatisfied with the resolution provided by the Grievance Officer, the Data Principal may escalate the matter to the Data Protection Board of India in accordance with the provisions of the Act.

17 Amendments to This Policy

17.1 The Company reserves the right to amend, modify, or update this Policy at any time, subject to the requirements of applicable law.

17.2 Any amendments to this Policy shall be effective from the date of publication on the Website. The date of the most recent revision shall be reflected in the version control information on the cover page of this Policy.

17.3 Where any amendment materially affects the rights of Data Principals or the manner in which their Personal Data is processed, the Company shall provide reasonable notice of such amendment, which may include a prominent notice on the Website or direct communication to affected Data Principals where practicable.

17.4 The continued use of the Website by a Data Principal following the publication of any amendment to this Policy shall be deemed to constitute acceptance of the amended Policy. Data Principals who do not accept the amended Policy are advised to discontinue use of the Website and to contact the Grievance Officer to exercise any applicable rights.

18 Governing Law and Jurisdiction

18.1 This Policy shall be governed by and construed in accordance with the laws of the Republic of India, including but not limited to the Digital Personal Data Protection Act, 2023, the Information Technology Act, 2000, and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

18.2 Any dispute, claim, or controversy arising out of or in connection with this Policy, including any question regarding its existence, validity, interpretation, breach, or termination, shall be subject to the exclusive jurisdiction of the courts of competent jurisdiction situate in Bengaluru, Karnataka, India.

18.3 Nothing in this Policy shall be construed to limit the rights of any Data Principal to approach the Data Protection Board of India in accordance with the provisions of the Act.

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