

# ARTHA SERVICES LLC PRIVACY POLICY

Effective as of November 30, 2022

Artha Services LLC (the “Company”) is committed to maintaining robust privacy protections for its users. Our Privacy Policy (“Privacy Policy”) is designed to help you understand how we collect, use and safeguard the information you provide to us and to assist you in making informed decisions when using our Service.

In the foregoing Privacy Policy, the “Site” or “Website” refers to <https://arthasvc.com/> and any accompanying or associated mobile or other device based applications. “App” refers to our mobile application (iCoFound) available on the Apple App Store and Google Play Store. The App and the Site may collectively be referred to as “Site” or “Website” or “App” in this Privacy Policy, and any reference to the Site or Website or App can be inferred to include reference to the App and the Website/Site simultaneously.

“Service” means the Company’s services accessed via the App and Site, in which users of the App and Site can register and connect with other users.

The terms “we,” “us,” and “our” refer to the Company.

“You” or “user” or “User” refers to you, as a user of our App or our Service.

By accessing our App and Site, you accept our Privacy Policy and Terms of Use (found here: <https://arthasvc.com/terms-and-conditions>), and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy.

## 1. INFORMATION WE COLLECT

We collect “Non-Personal Information” and “Personal Information.” **Non-Personal Information** includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. **Personal Information (or Personal Data)** includes information that may identify an individual and may include information such as your email address, name, address, date of birth, gender, profession and contact information, which you submit to us through the registration process with the Site and App. Furthermore, Personal Information may also be defined in accordance with applicable privacy laws, and to the extent any such law applies to us and our Service, such definitions of Personal Information will also apply. We request various types of Personal Data from you, and can only receive such data if you provide it willingly and consent to its provision to us, when opening an account on this Website or procuring any product, service or content through this Website. Any use or transmittal of your data will only be completed once you are made completely aware of its use and transmittal, and then only with your consent. If you wish to know of any specific use of your data that may be undertaken by the Company, please email us at [contactus@arthasvc.com](mailto:contactus@arthasvc.com).

### a) *Information collected via Technology*

i. To activate the Service you do not need to submit any Personal Information other than

your email address, name, profession and date of birth. To use the Service thereafter, you need to submit further Personal Information, which may include: gender, profession, location and contact information as well as the following: professional skills, business preference . This will enable other users to see and as this information about you is posted, connect with you.

ii. **App and Site Related Analytics.** We use technical means to improve the quality of the Services. This includes tracking information provided to us by your browser or by our App when you view or use the Service, such as the website you came from (known as the “referring URL”), the type of browser you use, the device from which you connected to the Service, the time and date of access, and other information that does not personally identify you. We track this information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user’s browser from our servers and are stored on the user’s computer hard drive. Sending a cookie to a user’s browser enables us to collect Non-Personal information about that user and keep a record of the user’s preferences when utilizing our services, both on an individual and aggregate basis. However, this information may also be considered Personal Information under applicable law, and therefore for compliance purposes, we will treat such information as Personal Information to the extent required under applicable law, and to the extent such information can be used to identify you in any way. For example, the Company may use cookies to collect the following information:

- device information
- location
- search queries
- when and where you saw previous advertisements
- how many times you’ve seen an ad
- what links you click on

iii. The Company may use both persistent and session cookies; persistent cookies remain on your device after you close your session and until you delete them, while session cookies expire when you close your session.

iv. If you do not want us to collect the information mentioned above, do not use the Website or delete your account on the Website. Please note: If you restrict, disable or block any or all cookies from your web browser or mobile or other device, our services may not operate properly, and you may not have access to certain services or parts of the Website. We shall not be liable for any interruption in, or inability to use, our services or degraded functioning thereof, where such are caused by your settings and choices regarding cookies.

b) *Information you provide us by registering for an account with the App or Site*

In order to become a subscriber to the Service, you will need to create a personal profile. You can create a profile by registering with the Service and entering your email address and creating a user name and a password. By registering, you are authorizing us to collect, store and use your email address in accordance with this Privacy Policy in order to provide access to the App.

c) *Information You May Provide to Us by Using the App*

Once you become a subscriber to the Service you may elect to also provide some or all of the following information: User Profile Picture, User bio, User gender, User Date of Birth, User Zip Code, User location, User rating Count/Feedback, User Profession, User Professional experience, User Core Skills, and a few more details about the user's business approach like information on what inspires you, information on your values, to the extent you choose to make this information publicly viewable.

We use and display this information as follows: to present you with more personalized content, and information for other users to get to know about your professional skills and experience, and you may choose to display some or all of this information so other users can see. However, in all such instances, such information is only displayed publicly if you select to display such information of your own volition, and we are not responsible for displaying or circulating this information via our Site, or for any use of the information by other users or third parties who utilize such information, after you choose to make it publicly available.

We do not share with other users any of the following: Date Of Birth, password details, gender. Furthermore, please note messages sent between you and other users that are not readily accessible to the general public will be treated by us as private to the extent required by applicable law, however, do note that messages sent via our chat and messaging system are not necessarily encrypted and may be accessible by us or our staff.

d) *Children's Privacy*

You may not use the App if you are under 18. The Service is not directed to anyone under the age of 18. In the event that we learn that you are under 18, or that we have gathered personal information from anyone under the age of 18 without the consent of a parent or guardian, we will delete that information as soon as possible. If you believe we have collected such information, please contact us at [contactus@arthasvc.com](mailto:contactus@arthasvc.com).

e) *No Discrimination for Opting Out*

The Company shall not discriminate when providing services, software or content through this Website, if any User refuses to provide their consent for the processing their Personal Data and provides this refusal to the Company in writing at the address specified in this policy, and services, content, access, or software use shall only be discontinued for such Users to the extent any such Personal Data is required and needed to continue providing access to such services, content, access, software or to this Website in general.

## 2. HOW WE USE AND SHARE INFORMATION

a) *Personal Information:*

Except as otherwise stated in this Privacy Policy, we do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties without your consent. We do share Personal Information with vendors who are performing services for the Company and with whom we have written agreements, in order to permit Us to provide the Services to You, such as the servers for our email communications who are provided access to the user's

email address for purposes of sending emails from us. Those vendors use your Personal Information only at our direction and in accordance with our written agreements with them which contain terms protective of the confidentiality of any Personal Information.

In general, the Personal Information you provide to us is used to help us communicate with you. For example, we use Personal Information to contact users in response to questions, solicit feedback from users, provide technical support, and inform users about promotional offers.

We may share Personal Information with outside parties if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable legal process or enforceable governmental request; to enforce applicable Terms of Service, including investigation of potential violations; address fraud, security or technical concerns; or to protect against harm to the rights, property, or safety of our users or the public as required or permitted by law.

Furthermore, you agree that we may also use your Personal Information in order to send you offers or marketing materials, as well as to market products or services of third parties, for the purpose of informing you regarding, and marketing products or services we think you may be interested in.

*b) Non-Personal Information:*

In general, we use Non-Personal Information to help us improve the Service and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyze use patterns on the App. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

In the event we undergo a business transaction such as a merger, acquisition by another company, or sale of all or a portion of our assets, your Personal Information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of our assets may continue to process your Personal Information as set forth in this Privacy Policy. If our information practices change at any time in the future, we will post the policy changes to the App, and if required by applicable law, we will notify you directly by email, so that you may opt out of the new information practices. We suggest that you check the App periodically if you are concerned about how your information is used.

*c) Data Transfer Outside Your Home Jurisdiction*

Data transfer abroad is based on consent, in that we shall only transfer your data outside your home jurisdiction, whether it is in the European Union (“EU”) or European Economic Area (“EEA”), or elsewhere, for the purpose of providing access to this Website and any products or services offered to you through this Website. Such data transfer will be to third parties who maintain confidentiality requirements and data protection capabilities sufficient to protect and secure your data, if this is at all required. By registering an account with us, you hereby agree to allow your data to be transferred outside the EU/EEA/your home jurisdiction for the reasons described in this Privacy Policy, and subject to the terms described herein.

### 3. HOW WE PROTECT INFORMATION

We implement security measures designed to protect your information from unauthorized access. Your account is protected by your account password and we urge you to take steps to keep your personal information safe by not disclosing your password and by logging out of your account after each use of the App. We further protect your information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology. However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. By using our Service, you acknowledge that you understand and agree to assume these risks.

### 4. YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL INFORMATION

You have the right at any time to prevent us from contacting you for marketing purposes. When we send a promotional communication to a user, the user can opt out of further promotional communications by following the unsubscribe instructions provided in each promotional email. Please note that notwithstanding the promotional preferences you indicate by unsubscribing, we may continue to send you administrative emails including, for example, periodic updates to our Privacy Policy.

### 5. LINKS TO OTHER WEBSITES

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the App and the Service. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link on our App or via our Service or any third party application. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

### 6. CHANGES TO OUR PRIVACY POLICY

The Company reserves the right to change this policy and our Terms of Service at any time. We will notify you of significant changes to our Privacy Policy by placing a prominent notice on our App, and to the extent legally required (and if not legally required, at our discretion), by emailing you directly. Significant changes will go into effect 30 days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the App and this privacy page for updates.

### 7. CONTACT US

If you have any questions regarding this Privacy Policy or the practices of this Site, please contact us by sending an email to [contactus@arthasvc.com](mailto:contactus@arthasvc.com).

### 8. DATA THAT WE DO NOT PROCESS

Unless stated otherwise, or unless you voluntarily provide this information via the Site, we do not process your Personal Data as it relates to revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and we do not engage in the processing of your genetic data or biometric data for the purpose of uniquely identifying you as a natural person, or process data concerning your health or sex life or sexual orientation.

## 9. DATA BREACHES

You will be notified of any breach of Personal Data stored on this Website or provided to us by you within 72 hours of the occurrence of such a breach. At the time we notify you of the breach, we shall also inform you as to all rectification steps we have taken to rectify and mitigate the breach. For information related to our data security and the security of any Personal Data you provide us via this Website, please get in touch with us at the contact address specified in this Privacy Policy.

## 10. DELETION OF DATA

We may, at our discretion (unless required under applicable law), confidentially store and maintain your Personal Data for up to two years after your account or use of any services on this Website is discontinued, for record keeping purposes. After this two-year period, we may permanently delete your data from our databases, at our sole discretion. If you have any questions or queries about our storage and deletion of your data, you can contact us at the email address specified in this Privacy Policy. During the time we store your Personal Data, after you have ceased using your account with us or any services through this Website, we will not transmit your Personal Data to any third parties.

## 11. USER'S RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT

To the extent that the California Consumer Privacy Act ("CCPA") is applicable to either the Company or the User: both parties agree to comply with all of their obligations under the CCPA; and in relation to any communication of 'Personal Data' as defined by the CCPA, the parties agree that no monetary or other valuable consideration is being provided for such Personal Data and therefore neither party is 'selling' (as defined by the CCPA) Personal Data to the other party, unless specifically agreed for and consented to by the parties.

The principal rights the User has under the CCPA include but are not limited to:

- (1) the right to know the Personal Data we collect from the User;
- (2) the right to request the deletion of User's Personal Data;
- (3) the right not to be discriminated against for having exercised User's rights under the CCPA;
- (4) the right to opt out from the collection/sale of User's Personal Data; and
- (5) the right to access User's Personal Data.

Both parties agree to notify the other immediately if they receive any complaint, notice, or communication that directly or indirectly relates to either party's compliance with the CCPA. Specifically, we shall notify User within ten (10) working days if we receive a verifiable consumer request under the CCPA.

## 12. RIGHTS OF EU USERS

Residents of the European Economic Area (“EEA”) and the EU may be entitled to rights under the GDPR. If you qualify, these rights are summarized below.

a) If you request to exercise your rights under the GDPR, we may require verification of your identity before we respond to any such request. If you are entitled to these rights, you may exercise the following rights with respect to your Personal Data that we collect and store:

- (1) the right to withdraw consent to data processing at any time;
- (2) the right of access to your Personal Data;
- (3) the right to request a copy of your Personal Data;
- (4) the right to correct any inaccuracies in your Personal Data;
- (5) the right to erase your Personal Data;
- (6) the right to data portability, meaning to request a transfer of your Personal Data from us to any other person or entity as chosen by you;
- (7) the right to request restriction of the processing of your Personal Data; and
- (8) the right to object to processing of your Personal Data.

b) You may exercise these rights free of charge. These rights will be exercisable subject to limitations as provided for by the GDPR. Any requests to exercise the above-listed rights may be made to: [contactus@arthasvc.com](mailto:contactus@arthasvc.com).

### 13. PIPEDA COMPLIANCE

We endeavor to offer Services and our privacy practices that are compliant with the Personal Data Protection and Electronic Documents Act (“PIPEDA”) fair information principles. In addition to the disclosures made above, we:

- a) Have appointed a privacy officer to monitor our compliance with PIPEDA.
- b) Only collect Personal Data for the uses described herein.
- c) Only use and disclose Personal Data as described herein.
- d) Take reasonable steps to verify the accuracy of the Personal Data that we collect.
- e) Take appropriate safeguards to protect the Personal Data, as further described herein.

If you are a Canada resident, you have the right to request access to the existence, use and disclosure of your Personal Data. Additionally, you have the right to challenge the accuracy and completeness of the information and request to have it amended as appropriate. Finally, you have the right to challenge our compliance with the PIPEDA fair information principles by contacting our privacy officer. To exercise your rights under this Section, please send an email to [contactus@arthasvc.com](mailto:contactus@arthasvc.com).

### 13. OTHER APPLICABLE DATA PROTECTION LAWS

To the extent that you have rights under any current or future privacy laws, you may contact us at [contactus@arthasvc.com](mailto:contactus@arthasvc.com) to exercise any applicable rights you may have under such laws. To the extent that such laws apply to you and to us, we will respect your rights in accordance with such laws.

### 14. ACCESS TO PERSONAL DATA

You can access the Personal Data we hold about you by contacting us using the contact details

listed above. Sometimes, we may not be able to provide you with access to all of your Personal Data and, where this is the case, we will tell you why. We may also need to verify your identity when you request your Personal Data. If you think that any Personal Data we hold about you is inaccurate, please contact us using the contact details provided above and we will take reasonable steps to ensure that it is corrected. We will consider and respond to all requests in accordance with applicable laws.

Last Updated: This Privacy Policy was last updated on November 30, 2022.