



PRIVACY POLICY

We value your privacy. This Carnot Privacy Policy (“this Policy”) informs You of your choices and our practices regarding any information You provide to us when using our Services (as defined in the Carnot Terms of Service). This Policy is incorporated into and forms part of the Carnot Terms of Service. If You do not agree with the terms of this Policy You may not use our Services. Your use of our Services signifies your acceptance of Carnot Terms of Service and this Policy.

By “we”, “our” or “us”, we mean our company, Carnot Technologies Private Limited, and by “you” we refer to the users of our products and services.

Your use of our Services may involve the collection and use of your Information (as defined hereunder) by us and so please read this Policy carefully.

By using our services, You agree that we may collect, use and share your Information in accordance with this Policy, as may be revised from time to time.

(i) SCOPE OF THIS PRIVACY POLICY

1. This Policy applies across all of our Services. In providing our services, we collect, store and use Information relating to You.
2. Please also note that this Policy does not apply to Information collected by other companies and organisations who advertise their services through our Services.

(ii) CHANGES TO THIS PRIVACY POLICY:

We may from time to time revise or add specific instructions, policies and terms to this Policy. By continuing to use our Services after any changes to this Policy, with or without notice from us, You are agreeing to the revised Privacy Policy.

(iii) THE INFORMATION WE COLLECT AND HOW WE COLLECT IT



“Information” includes Personal Information, Non-Personal Information, Vehicle Location Information, Driving Data, Log Data and Shared Information, as defined below.

1. Personal Information

- a. Depending on what services You use, your Personal Information will be collected by us in different ways.
- b. “Personal Information” is any information or combination of information that relates to You, and can be used to identify You. Personal Information may include, but will not be limited to the following:
 - i. Information You make available to us when You register on www.carnot.co.in (“the Site”) and on the Carnot Mobile Application and when you purchase the Carnot Car Adapter (“the Adapter”), including but not limited to your name, mobile number, emergency contact number, gender, date of birth, residential address and email address;
 - ii. Information from one device to another in the event you sync multiple devices with the Adapter and the Carnot Mobile App.
 - iii. Information which you make available to us and information which we collect as You use our Services, including but not limited to your Vehicle Identification Number, Vehicle Model and sub model, Driving Data, Location Data and Log Data;
 - iv. Billing information, provided by You at the time of your purchase of the Adapter.
- c. Certain information relating to the hardware and software on your mobile device will be accessed in order to provide You with the services and functionalities that use such hardware and software.

2. Information from your Vehicle’s Onboard Computer:

To enable our Services, we collect and store information about the vehicle into which you plug the Carnot Car Adapter. Examples of the type of information we



collect from the vehicle's onboard computer and sensors include: data from the mass air flow sensor and trouble codes.

3. Driving Data:

"Driving Data" is the data that we collect regarding your driving patterns, breaking and accelerating patterns, speed, time of drive, vehicle crash data, vehicle health, mileage and includes your driving score.

4. Vehicle Location Information:

"Vehicle Location Data" is information that we collect regarding the location of your vehicle, including your "Trip Route" and the "Parked Vehicle Location Information" of your vehicle. Trip Routes allow you to review a particular route that you've driven, the fuel cost associated with that route, and the length of time the particular route takes to drive. Parked Vehicle Location Information helps you to find your parked vehicle.

5. Cookies and Web Beacons:

On our website, we use a technology called "cookies." A cookie is a piece of information that the computer that hosts the Site gives to your browser when you access the Site.

Web beacons are electronic image files or other technologies that may be embedded within websites or emails that may be used to keep count of visitors, record when and if an email or website is viewed, or access certain cookies.

6. Non-Personal Information

"Non-Personal Information" is any information that relates to You but from which it is not practicable to directly or indirectly identify You, such as anonymous user usage data, referring / exit pages, platform types, clickstream data and includes Personal Information, Information about your Vehicle's onboard computer, Driving Data, Vehicle Location Information and Log Data in aggregated, anonymised or pseudo-anonymised form.



7. Log Data

“Log Data” is certain technical information that is automatically collected and logged by our servers when You use our Services, whether through the use of cookies, web beacons and log files or otherwise, including:

- i. Technical information such as your mobile carrier, configuration information made available by your web browser or other programs You use to access our services, your IP address and your device’s version and identification number; and
- ii. Information about the state of your device if the Carnot Mobile App crashes such as device model and built, device orientation, whether location services are active, operating system version, amount of memory free, amount of storage free and the amount of battery percentage;

8. Shared Information

“Shared Information” is information about You or relating to You that is voluntarily shared by You. For example, if you choose, you can share your vehicle’s location with the people with whom you share the vehicle, in which case we will collect such Shared Information.

(IV) HOW WE USE YOUR INFORMATION

1. We may use your Information for any of the following purposes:
 - a. To provide and maintain our Services to You;
 - b. To better understand how You access and use our services, for the purposes of trying to improve our services and to respond to your desires and preferences, including language and location customisation, personalised help and instructions, or other responses to your and other customers’ usage of our services;
 - c. To help you contact with your family or friends at times of emergencies or crashes, in the event you activate the “Crash Alert” feature on your Carnot Mobile App.
 - d. To help us develop new services and features;



- e. To improve the quality and design of our existing Services;
- f. To suggest third party services based on your location and in line with your preferences;
- g. To investigate and prevent the misuse of any of our services;
- h. To allow You to participate in surveys about our products and services. If You participate in a survey, we may request certain Personal Information from You. Participation in these surveys is voluntary and You therefore have a choice whether or not to disclose this information. We may use a third party service provider to conduct these surveys and such third party service provider will be prohibited from using your Personal Information for any purpose other than conducting the survey; and
- i. To help us to research and create and sell industry reports and give interesting insights such as “most common engine problems for different car brands”. Such reports are created using aggregated, anonymized data of driving patterns and vehicle performance, and will never contain any of your Personal Information.

2. Information about your Vehicle’s Onboard Computer:

We collect information about vehicle’s onboard computer to help us calculate fuel efficiency of your vehicle and diagnose trouble codes, such as the vehicle’s “check engine” light, which help to explain why and diagnose the cause of any trouble in your vehicle.

3. Vehicle Location data

- a. Any Location Data sampled and saved by us will be sent to our servers so that we may associate the information relating to your present location with content relevant to you, like localized assistance at the time of vehicle crashes, third party insurance providers, etc. thereby providing You with a more customized experience with our services.
- b. Location Data allows you to track your car and see a live dashboard with your car speed wherever you are. Your Location Data will also be used to provide you alerts for towing, vandalism and thefts of your vehicle.



- c. The Carnot Mobile App uses your smartphone's location services (GPS, WiFi, cell tower triangulation or other similar satellite services or sensors in your mobile device) to record its location as you drive. You may disable sharing of Location Data, by changing the settings on your device, in which case You may not be able to access or use certain features within the Carnot Mobile App.
- d. When you activate the "Crash Alert" feature in the Carnot Mobile App, you are given the option to list down an emergency contact, to be used by our emergency call center in the event of a crash. You may optionally add the name of such emergency contacts and they will be notified by way of an SMS in the event you are met with an accident, to enable you to get assistance, as soon as possible;

4. Driving Data:

- a. We collect and save your Driving Data to provide you with feedback on your driving habits. For example, we collect data on hard braking, hard acceleration and speed thereby providing you with insight into your driving style that can help you save on gas and vehicle wear and tear. Similarly, if your vehicle exceeds the speeds limits set by you, you will get a rash driving alert on your Carnot Mobile App.
- b. Your Driving Data not only helps us and you to keep a log of your journeys but also helps us give you smart suggestions to improve your fuel economy, vehicle mileage and safety of driving.

5. Billing Information

- a. If you transact with us, we collect some additional information, such as a billing address, a credit / debit card number and a credit / debit card expiration date and/ or other payment instrument details and tracking information so that your payment for your purchase of the Adapter and our Services can be processed. We use the services of third parties to process your payments and we require that these third parties take the appropriate organizational and technical measures to protect data relating to your billing information. In such cases, we only provide such third party with the



information they need to perform their specific function. Please review the terms of use and privacy policies of those third parties before providing your banking or payment information.

(v) COOKIES AND WEB BEACONS:

1. We may use cookies and web beacons to collect, and store Information about You or relating to You so that You do not have to re-enter it the next time You use our services.
2. Our cookies help us analyze the usage of our Service and website. Cookies may also be placed by third-party analytics services that we use, such as Google Analytics. We may also use third-party marketing services that use cookies to market our products to you on external sites.
3. You can choose to opt-out of this by using the “Do Not Track” feature of your browser. However, the Site may not function properly if the ability to accept cookies is disabled.

(vi) STORAGE OF YOUR INFORMATION:

1. We operate servers in a number of jurisdictions around the world, so the server on which your Information is used and stored may not be in your jurisdiction. Please note that all Information is stored on our servers and synced regularly. You consent to the transfer of your Information (both inside and outside of your jurisdiction) for the purposes described in this Policy.
2. Your Information is securely hosted on our servers or the servers of our affiliates who’s services we use as cloud hosting.

(vii) SECURITY OF YOUR INFORMATION:

1. We use cryptographic protocols such as TLS v1.2 while communicating between the Adapter, your mobile device and servers, to ensure best in class security. All communications through our website are sent over SSL/TLS connections. Secure



Sockets Layer (SSL) and Transport Layer Security (TLS) technology protect communications by using both server authentication and data encryption. This ensures that user data in transit is safe, secure, and available only to intended recipients.

2. We use “HTTPS” for secure communication between the Carnot Mobile App and our servers. We also use encryption methods for the purpose of preventing loss, misuse, unauthorised access or disclosure of sensitive user data such as account passwords and email addresses.
3. User data on our database is logically segregated by account-based access rules. User accounts have unique usernames and passwords that must be entered each time a user logs on.
4. Carnot applications and infrastructure are regularly tested for security vulnerabilities and hardened to enhance security and protect against attacks. However, please be aware that despite our efforts, no data security measures can guarantee 100% security at all times and our systems may be subject to security breaches and failures which are due to circumstances beyond our reasonable control. If You have any questions regarding the security of your Information, please contact us at support@carnot.co.in

(VIII) SHARING OF YOUR INFORMATION

1. We may share your **Driving Data** with some of our partners in order to better serve you with offers on vehicle insurance, servicing, etc. However, you may opt-out of this Service from the Carnot Mobile App at any time, in which case you such functionality will not be available to you.
2. We collect Non-Personal Information that is, we anonymize and aggregate the data we collect across many users and may sell this aggregated data with our affiliates and business partners. The Non-Personal Information in this anonymized and aggregated form will never identify you personally. We may disclose, use and sell aggregated user statistics in order to describe us to current and prospective business partners and to third parties for other lawful purposes. We may also use anonymized



and aggregated data for the purposes of research, thereby creating and selling industry reports. Examples of anonymized and aggregate data include the average morning work commute time of our users, and the average monthly cost of gas of our users.

3. In the event you use the “Crash Alert” feature on your mobile device, we will share your Vehicle Location and Personal Information with the emergency contacts that you have listed, if you are met with an accident.
4. Through the Carnot Mobile App you can share information regarding your vehicle with people you choose.
5. We want you to get the most value out of your Carnot experience and may present offers from trusted partners to provide a solution that we think would make your vehicle ownership and driving experience better.
6. In the rare case of a request by law enforcement or government, we will pursue every avenue available to inform you and protect your data.
7. Other than as permitted under this Policy or as otherwise consented to by You, we will not pass your Information to any other third parties for their processing for any purposes. Where your Information is passes on to third parties, we will ensure that the same is used for the limited purposes of providing and improving our services to you. You consent to the third party use, sharing and transfer of your Information, both inside and outside of your jurisdiction, as described in this Policy. We will not transfer your Information to any country or territory unless that country or territory ensures an adequate level of protection for your rights and freedoms in relation to the processing, storing and retention of Information.
8. In the event we are acquired by or merged with a third party, it may be the case that your Information is transferred to such third party who will continue to operate our Services or similar services under either this Privacy Policy or a different privacy policy which will be notified to You. Such right to transfer your Information lies solely with us. In the event



of our bankruptcy, insolvency or assignment for the benefit of creditors, we may not be able to control how your Information is treated, transferred, or used.

(IX) COMMUNICATIONS FROM US

1. Newsletters and other promotional communications

When You use our service, we may use your Information to send You emails, newsletters, articles, text messages, in-app messages or push notifications to your device. You will be given the option to opt out of promotional related communications.

2. Service-related announcements

We may from time to time send You service-related announcements when we consider it necessary to do so (such as when we temporarily suspend one of our Services for maintenance or the renewal of your membership with us). You may not opt-out of these service-related announcements, which are not promotional in nature.

(X) THIRD PARTY SERVICES ON OUR SERVICE

1. Our service may link You to, social media or other services (including websites) provided by third parties. For example:

- a. We may provide You with links, within our Services that allow You to access third party services or websites, whether or not to third party social media services; and/or
- b. The Carnot Mobile App can be downloaded from third party application stores and You agree to comply with their privacy policy and terms of use, if such compliance is applicable to the use of the Carnot Mobile App.

2. You will be made aware that you are going to be communicating with a third party before you leave Carnot's environment. Your use of any such third party services, including any Personal Information You provide to such third parties, are subject to the relevant third party's own terms of services and privacy policies and not this Policy, so please review their terms carefully.



3. This Policy only applies to any Information collected by us, it does not apply to any services offered by or information practices of any third parties, and we bear no liability for any third party use of any Information provided by You to them.

(XI) AGE RESTRICTIONS

To use our Services, you need to be above the age of 18 years. We do not knowingly collect Personal Information from any children under the age of 18. Please contact us at support@carnot.co.in if You believe we have any Personal Information from any children under the age of 18 or you have knowledge that our Services are being used by any children under the age of 18.

(XII) PERIOD OF USE OF YOUR PERSONAL INFORMATION

1. Your Personal Information will be stored by us for a fixed period of time. i.e.; till you are a member with us or you have the Carnot Mobile App on your mobile device, after which it will be permanently deleted. Alternatively, you may write to us at support@carnot.co.in and ask us to delete your account and we will delete your Information within a short period of time, given how our backup systems work.
2. After the deletion, termination or expiry of you account, we store your email id for sending You information about any improvements, enhancements and updates in our existing services and any new services and products launched by us, which in our opinion, may help to bring You back to our services. You will be given the option to opt-out of such promotional and marketing messages, in which case, You will no longer receive any of our marketing and advertising promotional messages and we will permanently delete your email id held by us.
3. You have the right to request to make any corrections to your Personal Information which we hold and store. We will respond to all requests made to us as soon as possible.
4. It is important to note that, even after your account may be terminated with us, for whatever reason, communications made by You using our services may put your Personal Information in the hands of third parties that we cannot control.



5. Your Non-Personal Information, in anonymized and aggregated form will be stored by us even after you cease to be a member with us, and shall be used in accordance with this Carnot Privacy Policy.

(XIII) CONTACT US

If You have any concerns about this Policy You may contact us via email on support@carnot.co.in

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(since version 1 was updated on July 13th)