

Privacy Policy

The web application and the associated website https://www.taxnodes.com/ any of our associated websites or mobile/web applications (collectively, the "Platform") are owned, operated and managed by Mlfirst Technologies Private Limited (CIN: U72900GJ2021PTC127597;), having its registered office at 1302, Gala Empire, Drive-in-Road, Memnagar, Thaltej Road, Ahmedabad City, Ahmedabad-380054, Gujarat (hereinafter referred to as "TaxNodes" or "Company" or "Us" or "We" or "Our", which term shall mean and include our affiliates and group entities).

Please carefully read this privacy policy ("Privacy Policy") before accessing any information, content, products, services, applications, tools, and features on the **Platform** or using our services. By clicking "I Agree", you agree that you have read, understood, and accepted each of the terms contained herein and agree to be bound by the same.

If you have objections to these terms, or any part thereof, and/or if you do not agree to be bound by these terms, or any part thereof, please do not access the Platform and do not use **TaxNodes** services in any manner.

GUIDING PRINCIPLES

- TaxNodes adheres to the following principles to protect your privacy.
- TaxNodes does not share your contact information with another user of the Platform, without your consent.
- Any Personal Information that you provide will be secured by industry standard protocols and technology in compliance with applicable law.

A. INTRODUCTION

This Privacy Policy specifies the manner in which your Personal Information is collected, received, stored, processed, disclosed, transferred, dealt with or otherwise handled by us and our affiliates in offering the Platform. This Privacy Policy explains (i) what Personal Information we collect; (ii) how we use it; (iii) with whom we share it; (iv) your rights; and (v) the measures that we undertake to protect your Personal Information; when you use our Platform. By clicking "I Agree" you agree to the collection, use, storage and dissemination of your Personal Information as set out below in this <u>Privacy Policy</u>. The Privacy Policy does not apply to entities that TaxNodes does not own or control. You should review this Privacy Policy every time you provide us with Personal Information. If you do not agree with this <u>Privacy Policy</u>, please do not proceed to use the Platform. We reserve the right to change, add, amend, modify the Privacy Policy terms hereof at our discretion from time to time.



B. WHAT PERSONAL INFORMATION WE COLLECT

- 1. "Personal Information" means any information including personally identifiable information or sensitive personal information that relates to you, which, whether directly or indirectly, in combination with other information available or likely to be available with us, is capable of identifying you.
- 2. We acknowledge and accept that the Personal Information that you impart to us, is to be kept in strict confidentiality and to use the Personal Information only in the manner which enables us to provide the services. We consider our relationship with you as invaluable and strive to respect and safeguard your right to privacy. We shall protect the personal details received from you with a reasonable degree of care, to prevent the unauthorised use, dissemination, or publication of this information. We have put in place reasonable security measures and safeguards to protect your privacy and Personal Information from misuse, unauthorised access, disclosure, destruction etc. in compliance with applicable laws.

Sr. No:	Category of Personal Information:	Description:
(i)	Identification Details:	This may include your first name and last name, mother's name, father's name, date of birth, gender, marital status, nominee details, cancelled cheque, Permanent Account Number ("PAN"), email id, phone number, photograph and video recording, email id, educational or professional qualification, business name, business address, nature of business, GSTIN Number (if applicable) bank account details, United Payments Interface (UPI) ID, and/or other payment and investment information and copies of KYC documents e.g. PAN, Driving License, Identity and Address Proof, Passport or AADHAAR information, photograph, IPV (in-person verification) video, bank account details etc, other sensitive personal data received for opening of a account that helps us confirm your identity and/or facilitate provision of the Services through our Platform.
(ii)	Contact Information:	This may include information such as your e-mail address, phone number, etc.
(vi)	Location Data:	This may include information about the location of the IP address or the location details provided by you.
(vii)	Account Details:	This may include information such as your login details, password, profile information, or the details of your interaction with our platform.



(viii)	Transaction Details:	This may include your information as may be provided by you such as Form 16, gains statement for return processing, wallet addresses of third party exchange, trade report in CSV or other format, transaction details and your digital assets portfolio.
(ix)	Device and Network Data:	This may include information such as your IP Address, browser details, IMEI number, the operating system of your device, etc
(x)	Usage and Analytics Data	This includes information such as the Platform usage pattern, user analytics or other similar data points.
(xi)	Required as per applicable laws	Such other information and documents including declaration of computation, asset declaration form and such other documents as may be required to be obtained by us, from time to time, as per the applicable laws, to provide the TaxNodes Services.

3. Other Details

- i. **Device and Network Data**: This may include information such as your browser details, , the operating system of your device, meta-data, app settings, device information, the date and time of your visit pages on our website, number of pages viewed etc.
- ii. **Usage and Analytics Data**: This includes information such as the Platform usage pattern, user analytics or other similar data points.
- 4. The collection of all the Personal Information described herein is necessary for your use of the services and functionality of the Platform. We receive Personal Information any time you use any service or functionality of the Platform, including the function that allows you to continue as a guest.
- 5. We also gather and store non-personal information to get page view statistics, to analyse trends and for better understanding of the usage of the site, and for system administration purposes. This information cannot and does not identify you personally.
- 6. We may collect or receive your information in the following ways:
 - i. Information you provide us: You may provide us with your information so as to enable us to provide you the services.
 - ii. Information we generate: We may use in-house or third-party analytics tools to help us track the usage of our services or interactions with our Platform.



- iii. Information we receive: We may receive your information from select third parties including our subcontractors and vendors; or other websites or applications we operate or the other TaxNodes services we provide.
- 7. All the data and/or information you share with us must be accurate and complete. You shall promptly inform TaxNodes in case of any change to your data or information which may impact the provision of our services. We shall not be responsible or held liable for any loss or damage that may occur to you or other third parties on account of provision of incorrect data or information provided by you.
- 8. We may ask you to provide us with your information if and when: (i) you register and make an account on the Platform, (ii) you add your wallet addresses of third party exchange (iii) you upload your trade report in CSV or other format, transaction details and your digital assets portfolio (iv) you correspond with us by phone, e-mail chat or otherwise (v) you subscribe to TaxNodes's newsletter, if applicable, (vi) we troubleshoot problems reported by you or (vii) you respond to a survey or fill out a form on the Platform.

C. HOW WE USE YOUR INFORMATION

1. We primarily use the Personal Information we collect to provide the services to you and for your use of the services. This includes using your information:

Sr.	Purpose	Description
No		
(i)	For the provision of our services:	 To provide TaxNodes services. To personalise your experience on the Platform regarding offers and promotions that we deliver, contact you about new features, products etc. and perform other activities; develop new products, identify usage trends, determine the effectiveness of our promotional campaigns, and
		 operate our business. To improve the Platform or the features of the Platform. To improve customer service.
(ii)	For verification and security purposes:	 To verify and process transactions on the Platform; To update and back-up our records; To enhance the security of our Platform and keep the same safe and secure;
(iii)	For the purpose of our internal operations:	To run our Platform and for other internal operations, including troubleshooting, data



		 analysis, testing, research, statistical and survey purposes; To detect and protect against error, fraud and other criminal or illegal activity, collect fees owed, enforce our terms and conditions; prevent abuse of our services, prevent violation of the rights of third parties, other users or the general public;
(iv)	For the purpose of communications and marketing:	 To notify you about changes to our services or Platform. To understand the effectiveness of advertising we provide and carry out. To send you information and updates pertaining to your orders. To send you occasional news, updates, and related information about the Platform. To send you relevant marketing material, if applicable.
(v)	For legal purposes:	 To comply with any statutory or regulatory requirement; To prevent and identify suspicious or other illegal transactions and to mitigate risks relating to money laundering and other illegal activities.
(vi)	For informing you about relevant services	• We may share your information with related parties or third party service providers, to enable them to market their relevant services and send you information we think may be of interest to you.

- 2. Your Personal Information, whether public or private, will not be sold, exchanged, transferred, or given to any other entity except as set out in this Privacy Policy. You hereby consent and allow TaxNodes to share your information for the following purposes:
 - i. for delivering the services requested by you from the Platform;
 - ii. for carrying out know-your-customer verification and client due diligence;
 - iii. in connection with a promotion, survey or other feature;
 - iv. for sending periodic emails and other communications; and



v. for the disclosure or transfer of information as required by, or in furtherance of our compliance with applicable laws or any judicial or governmental proceeding.

D. WITH WHOM WE SHARE IT

- 1. We may host, transfer and process data, including Personal Information in Indian servers.
- 2. We do not sell, trade, or otherwise transfer your Personal Information to third parties for profit. However, we may share the information we collect on an as-needed basis with trusted third parties and subcontractors who assist us in operating the Platform, conducting our business, or servicing you.
- 3. We seek to ensure that such third parties agree to keep this Personal Information confidential and that they ensure the same level of data protection that is adhered to by TaxNodes.
- 4. Accordingly, we may share your information with:
 - i. Law Enforcement Authorities: We may share your information with governmental agencies and regulatory bodies, prevention of money-laundering authorities and any other authority as required or requested for due fulfilment of legal and regulatory compliance.
 - ii. Transaction Facilitators: We may also share the information so collected with third parties in connection with providing services, products and features accessed by you and where we feel they can contribute to add value and improve the quality of services offered to you. We may share your information with transaction facilitators who authenticate KYC and other details as provided by you, commercial banks which provide banking facilities; payment processing companies and other exchanges we may work with for providing our services.
 - iii. **Cloud Platforms:** We may use third-party cloud service providers to store and process your information, including but not limited to Google Cloud platform, Microsoft Azure & Amazon Web Services.
 - iv. **Analytics Platforms:** We may use certain third-party applications to perform analytics-related tasks. Such platforms include, but are not limited to Google Analytics, Microsoft Azure & Amazon Web Services.
- 5. We may share non-personally identifiable information with other parties. We also use certain information in an aggregated form across users to compile statistical and demographic profiles for our business and marketing activities.
- 6. Third Party Links: Occasionally, at our discretion, we may include or offer third party products or services on the Platform. These third party sites may have separate and independent privacy policies. We have no responsibility or liability for the content and activities of these third party sites. Nonetheless, we seek to protect the integrity of the Platform and welcome any feedback about these third party sites.

E. HOW WE PROTECT YOUR INFORMATION



We follow applicable industry standards and best practices to reasonably secure your information. We use firewalls and SSLs to help protect the information we collect from you when it is being communicated to us. Our policies restrict access to your Personal Information to only those employees and service providers who need to know the information in order to provide you the services. We maintain physical, electronic and procedural safeguards that comply with applicable privacy and data security laws and regulations.

F. YOUR CONSENTS

By clicking "I Agree" you consent to the use of your Personal Information by us, our affiliates and third parties, service providers, vendors in addition to governmental agencies and regulatory bodies in accordance with the terms contained herein.

G. YOUR CHOICES

- 1. You always have the right to refuse or withdraw your consent to provide/share/disseminate your sensitive personal information and such a request must be made to us in writing. However, in such an event, you will no longer be able to avail our services. You can configure your browser or phone settings to reject all cookies, or to notify you when a cookie is set. Each browser is different, so you need to check the Help menu of your browser to learn how to change your cookie and privacy preferences. However, if you reject cookies, your use of services may be impaired, restricted or stopped. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.
- 2. You can ask us for copies of your Personal Information being processed or retained by us.
- 3. You can ask us to rectify inaccurate or incomplete Personal Information about you, which we can assist you with.
- 4. You can close your Account. Even though your account is closed, we still may retain and use your Personal Information to prevent fraud, resolve disputes, assist with any investigations, and otherwise comply with applicable law.
- 5. If you choose not to provide your Personal Information or to withdraw your consent, our ability to provide you the services may be affected and we may not be able to provide you the access to our Platform or the services therein.
- 6. In order to exercise any of your rights you may send us an email at support@TaxNodes.com detailing your request. We may undertake additional measures to confirm your identity.

H. **DISCLAIMER**



- 1. We do not make any express or implied warranties about the Platform, including but not limited to implied warranties of merchantability, fitness for a particular purpose, or non-infringement. The Platform is made available to you "as is" and "as available" and we do not warrant that any defects or inaccuracies will be corrected.
- 2. We do not warrant that the Platform will meet your needs, or that the Platform or access to it will be uninterrupted, timely, secure, or error-free. We also provide no warranty that the results obtained from the use of the Platform will be accurate or reliable, or that the quality of any products, services, information, or other material obtained by you through the Platform will meet your expectations.

I. COMPLAINTS

If you have any grievance, objection or complaint about TaxNodes or any incident concerning these Privacy Policy, you may contact our grievance officer i.e. the Director Strategy of the Company by sending an email to support@TaxNodes.com and in furtherance thereto, provide us with all the necessary/relevant assistance, information and/or documents concerning such matter. We will undertake reasonable/fair/appropriate efforts to investigate and resolve your complaint.

J. FORCE MAJEURE

We shall not be responsible for delay or default in the performance of our obligations due to contingencies beyond our control, such as (including but not limited to) losses caused directly or indirectly by fire, flood, civil commotion, earthquake, war, strikes, failure of the systems, failure of the internet links, market fluctuations, cyber attacks, or government/regulatory or third party action.

K. GOVERNING LAW

This Privacy Policy, its subject matter and its formation, are governed by the laws of the Republic of India. The courts of Ahmedabad, Gujarat, India will have exclusive jurisdiction to deal with any dispute arising out of or in connection with this Privacy Policy or any other terms and conditions made applicable on you by us and you consent to the jurisdiction and venue of such courts and waive any objection as to inconvenient forum.

Last updated on: 5 July, 2024