

HRDWYR VENTURES PRIVATE LIMITED

PRIVACY POLICY

Effective Date: / Last Revised:

1. Introduction

HrdWyr Ventures Private Limited (hereinafter referred to as "HrdWyr", "we", "us", or "our") is a semiconductor technology company headquartered at Ground Floor, Workhub by Novel Office, Graphite India Main Road, Doddanakundi Industrial Area, Whitefield, Bengaluru, Karnataka - 560048, India. HrdWyr designs and develops verticalized, AI-enabled System-on-Chip (AISOc) solutions, including the Indus family of ultra-low-power SoCs, the Intelligent Power Management Module (iPMM), and advanced edge computing platforms serving industrial, data center, consumer electronics, and mobility sectors.

We are committed to safeguarding the privacy and personal information of all individuals who interact with our website located at www.hrdwyr.com (the "Site"), as well as our products, technologies, and services. This Privacy Policy ("Policy") sets forth the principles and practices governing how HrdWyr collects, uses, stores, shares, and protects personal information. It also explains the rights available to individuals whose personal information we process.

By accessing or using our Site, contacting us for business inquiries, or engaging with our products and services, you acknowledge that you have read and understood this Policy. If you do not agree with any part of this Policy, you should discontinue your use of our Site and services.

2. Scope of This Policy

This Policy applies to all personal information collected and processed by HrdWyr in connection with:

- Visits to and interactions with the HrdWyr website (www.hrdwyr.com).
- Business communications, including enquiries submitted via email or through our contact channels.

- Engagement with our semiconductor products, AISOc technologies, and related software.
- Interactions with our social media profiles on LinkedIn and X (formerly Twitter).
- Participation in technical evaluations, demonstrations, partnership discussions, and events.
- Recruitment and employment-related processes.

This Policy does not apply to information collected through third-party websites, platforms, or services that may be linked from our Site. HrdWyr is not responsible for the privacy practices of such third parties, and we encourage you to review their respective privacy notices.

3. Key Definitions

Personal Information: Any information that identifies, relates to, describes, or can be reasonably associated with a particular individual. This includes, but is not limited to, names, email addresses, phone numbers, professional details, IP addresses, and usage data.

Data Controller: HrdWyr Ventures Private Limited, which determines the purposes and means of processing personal information.

Data Processor: Any third party that processes personal information on behalf of HrdWyr.

Processing: Any operation performed on personal information, including collection, recording, storage, adaptation, retrieval, use, disclosure, or deletion.

Sensitive Personal Information: A subset of personal information that warrants additional protection, such as financial data, health information, or government identification numbers.

Cookies: Small text files stored on a user's device by a web browser to retain information about the user's preferences and browsing activity. Please refer to our separate Cookie Policy for further details.

4. Personal Information We Collect

HrdWyr collects personal information through various means and from multiple sources, depending on how you interact with us. The categories of information we collect include:

4.1 Information You Provide Directly

When you contact us for business enquiries, request product demonstrations, participate in partnerships, or apply for a position with us, you may provide:

- Full name, professional title, and employer/organization name.
- Business email address and telephone number.
- Country of residence or operation.
- The nature of your enquiry, technical requirements, or area of interest.
- Curriculum vitae, cover letters, and professional credentials for employment applications.
- Correspondence and communications were exchanged with our team.

4.2 Information Collected Automatically

When you visit our Site, we may automatically collect certain technical and usage information, including:

- Internet Protocol (IP) address and approximate geographic location derived therefrom.
- Browser type and version, operating system, and device type.
- Pages visited, time spent on each page, and navigation paths within the Site.
- Referring URLs and search terms used to reach the Site.
- Date and time of access.
- Cookie identifiers and similar tracking technologies (please refer to our Cookie Policy).

4.3 Information Collected from Third-Party Sources

We may receive information about you from third-party sources, including:

- Professional networking platforms, such as LinkedIn, where you have made your profile publicly accessible.
- Business partners, technology distributors, or referral sources.
- Publicly available industry directories, conference registrations, or trade association databases.
- Analytics and marketing service providers.

4.4 Information We Do Not Intentionally Collect

HrdWyr does not knowingly collect sensitive personal information such as government identification numbers, financial account details, health or biometric data, racial or ethnic origin, religious beliefs, or political opinions through our Site, except where explicitly required for specific purposes (e.g., tax compliance in the course of commercial agreements) and where you have been specifically

informed. We do not intentionally collect personal information from individuals under the age of 18.

5. How and Why We Use Your Personal Information

HrdWyr processes personal information only for legitimate, specific, and clearly defined purposes. The table below outlines our key processing activities, their purposes, and the applicable legal bases under relevant data protection laws, including India's Digital Personal Data Protection Act, 2023 (DPDPA), the General Data Protection Regulation (GDPR), where applicable to individuals in the European Economic Area, and other applicable international frameworks.

5.1 Business Communications and Enquiry Management

We process personal information provided through business enquiries and contact requests to respond to your questions, evaluate potential commercial or technical partnerships, and facilitate engagement with our semiconductor product portfolio. Legal basis: Legitimate interest in conducting business operations; performance of a pre-contractual or contractual relationship.

5.2 Product and Technology Engagement

Where you engage with HrdWyr regarding our AISoC technologies — including the Indus family of SoCs, intelligent edge solutions, or data center power management products — we may process your information to provide technical documentation, product evaluation materials, and tailored solution proposals. Legal basis: Legitimate interest; performance of a contract.

5.3 Website Operation and Security

We automatically process technical data to ensure the proper functioning and security of the Site, detect and prevent fraudulent or unauthorized activity, conduct website analytics, and improve the user experience. Legal basis: Legitimate interest in maintaining secure and functional digital infrastructure.

5.4 Marketing and Communications

With your consent, or where permitted by applicable law, we may use your contact information to share updates on HrdWyr's products, technologies, industry developments, events, or publications. You may opt out of marketing communications at any time by contacting us at the email address provided in Section 15 of this Policy. Legal basis: Consent; legitimate interest.

5.5 Recruitment and Human Resources

We process personal information submitted in job applications or through professional networking platforms to assess candidate suitability, conduct background verification where required by law, and manage the recruitment lifecycle. Legal basis: Consent; legitimate interest; compliance with employment law obligations.

5.6 Legal Compliance and Regulatory Obligations

We may process personal information as necessary to comply with applicable laws and regulations, respond to lawful requests from governmental or regulatory authorities, enforce our legal rights, or protect the rights, safety, and property of HrdWyr, our employees, customers, or third parties. Legal basis: Compliance with a legal obligation.

5.7 Research, Development, and Innovation

Aggregated, anonymized, or de-identified data derived from website usage and product interactions may be used to inform product development decisions, improve our AISoC architectures, and advance our research in edge AI, semiconductor design, and power management solutions. In such cases, individual identities are not discernible from the data used.

6. Disclosure and Sharing of Personal Information

HrdWyr does not sell, rent, or trade your personal information to third parties for their own commercial purposes. We may, however, disclose personal information in the following circumstances:

6.1 Service Providers and Technology Partners

We engage carefully selected third-party service providers to perform functions on our behalf, including website hosting and maintenance, email communication infrastructure, data analytics, cloud storage, and customer relationship management. These providers are contractually bound to process personal information only in accordance with our instructions and to maintain appropriate security standards.

6.2 Business Partners and Technology Ecosystem

In the course of joint development initiatives, distribution agreements, or technology licensing arrangements, we may share professional and business contact information with partner organizations in the semiconductor, AI, and data infrastructure sectors, subject to appropriate confidentiality and data protection obligations.

6.3 Legal and Regulatory Disclosure

We may disclose personal information where required by applicable law, regulation, court order, or governmental authority. We may also disclose information where we believe in good faith that such disclosure is necessary to protect our rights, prevent fraud, ensure the safety of individuals, or enforce our contractual or legal rights.

6.4 Corporate Transactions

In the event of a merger, acquisition, restructuring, joint venture, or sale of all or part of HrdWyr's business or assets, personal information held by us may be transferred to the relevant counterparty, subject to equivalent privacy protections. We will notify affected individuals of any such transfer as required by applicable law.

6.5 With Your Consent

We may share personal information with third parties for purposes not described in this Policy where you have given us specific and informed consent to do so.

7. International Transfers of Personal Information

HrdWyr is headquartered in Bengaluru, India, and primarily operates within India. However, given the global nature of our semiconductor business and the deployment of our AISoC technologies across data center, industrial, and consumer electronics markets worldwide, personal information may be transferred to and processed in countries other than your country of residence. These may include countries where our technology partners, cloud service providers, or business counterparts are located.

Where personal information is transferred internationally, HrdWyr implements appropriate safeguards to ensure that such transfers comply with applicable data protection laws, including:

- Entering into standard contractual clauses or data processing agreements with the receiving party.
- Transferring data only to countries or recipients that provide an adequate level of protection as determined by the relevant regulatory authority.
- Obtaining your explicit consent where required by law.

Individuals located in the European Economic Area (EEA), the United Kingdom, or other jurisdictions with specific cross-border transfer restrictions may be entitled to additional protections. Please contact us if you require further information about the safeguards applicable to your information.

8. Data Retention

HrdWyr retains personal information only for as long as reasonably necessary to fulfil the purposes for which it was collected, or as required by applicable law, regulation, accounting standards, or contractual obligations. The criteria used to determine retention periods include:

- The nature of the relationship with the individual (e.g., prospective partner, recruitment applicant, or existing business contact).
- The applicable statute of limitations for legal claims.
- Any regulatory requirement to retain records for a specified minimum period.
- The continued business relevance of the information.

Upon expiry of the applicable retention period, personal information is securely deleted or anonymized in accordance with our internal data disposal procedures. Anonymized or aggregated data, which cannot be used to identify individuals, may be retained indefinitely for analytical or research purposes.

9. Data Security

HrdWyr employs technical, administrative, and organizational measures designed to protect personal information against unauthorized access, disclosure, alteration, loss, or destruction. These measures are commensurate with the sensitivity of the information and include:

- Encryption of data in transit using industry-standard protocols (e.g., TLS/SSL).
- Access controls and authentication mechanisms to limit access to personal information to authorized personnel only.
- Regular review and assessment of our information security practices.
- Secure storage of data on protected infrastructure.
- Confidentiality obligations are imposed on employees, contractors, and service providers.

While we take all reasonable precautions, no method of electronic transmission or storage is entirely secure. HrdWyr cannot guarantee the absolute security of personal information. In the event of a data breach that is likely to result in a risk to your rights and freedoms, we will notify you and the relevant supervisory authority in accordance with applicable law.

10. Your Privacy Rights

Depending on your country of residence and applicable data protection legislation, you may be entitled to exercise certain rights in relation to your personal information. These rights include, but are not limited to:

10.1 Right of Access

You have the right to request confirmation of whether HrdWyr processes personal information about you, and if so, to obtain a copy of that information along with details about the processing.

10.2 Right to Rectification

You have the right to request correction of any inaccurate or incomplete personal information we hold about you. We encourage you to inform us promptly of any changes to your personal information.

10.3 Right to Erasure

In certain circumstances, you have the right to request deletion of your personal information, for example, where the information is no longer necessary for the purpose for which it was collected, or where you withdraw consent and there is no other legal basis for continued processing.

10.4 Right to Restrict Processing

You may have the right to request that HrdWyr restrict the processing of your personal information in certain situations, such as where you contest the accuracy of the information or where processing is unlawful but you prefer restriction over deletion.

10.5 Right to Data Portability

Where processing is based on your consent or a contractual relationship and is carried out by automated means, you may have the right to receive a copy of your personal information in a structured, commonly used, and machine-readable format, or to request that it be transmitted to another controller.

10.6 Right to Object

You have the right to object to the processing of your personal information for direct marketing purposes at any time. You may also object to processing based on our legitimate interests, subject to applicable legal exceptions.

10.7 Right to Withdraw Consent

Where processing is based on your consent, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

10.8 Right to Lodge a Complaint

If you are dissatisfied with how HrdWyr processes your personal information, you have the right to lodge a complaint with the relevant data protection supervisory authority in your jurisdiction. For individuals in India, this may include the Data Protection Board of India established under the Digital Personal Data Protection Act, 2023. For individuals in the EEA or the United Kingdom, the relevant national data protection authority in your country of residence.

10.9 How to Exercise Your Rights

To exercise any of the rights described above, please submit a written request to HrdWyr using the contact details provided in Section 15 of this Policy. We will respond to all verifiable requests within the timeframes prescribed by applicable law. We may request proof of identity before processing your request to prevent unauthorized disclosure.

11. Specific Provisions for Individuals in India

As an Indian company subject to the Digital Personal Data Protection Act, 2023 (DPDPA) and associated rules, HrdWyr commits to the following obligations as a Data Fiduciary under that legislation:

- Processing personal data only for lawful, specific, and stated purposes, with appropriate consent or other recognized legal grounds under the DPDPA.
- Implementing reasonable security safeguards to prevent unauthorized access, use, or disclosure of personal data.
- Notifying the Data Protection Board of India and affected data principals in the event of a personal data breach, as required.
- Honouring data principal rights as outlined in Section 10 of this Policy, within the timelines and procedures prescribed under the DPDPA.

- Erasing personal data upon withdrawal of consent or when it is no longer necessary for the stated purpose, unless retention is required by law.

HrdWyr does not knowingly process the personal data of children below the age of 18 years without verifiable parental or guardian consent, as required under the DPDPA.

12. Specific Provisions for Individuals in the EEA, United Kingdom, and Other Jurisdictions

To the extent that HrdWyr processes personal information of individuals located in the European Economic Area (EEA) or the United Kingdom (UK), the General Data Protection Regulation (GDPR) and the UK GDPR, respectively, may apply. In such cases:

- HrdWyr acts as a Data Controller in respect of personal information collected directly from EEA/UK-based individuals.
- Processing is carried out on one or more lawful bases under Article 6 of the GDPR (e.g., consent, legitimate interests, performance of a contract, or compliance with a legal obligation).
- Cross-border transfers of personal information to India are made in compliance with Chapter V of the GDPR, including through the use of appropriate Standard Contractual Clauses or reliance on adequacy decisions where applicable.
- Individuals in the EEA and UK retain all data subject rights enumerated under the GDPR and UK GDPR.

HrdWyr's products and services span industrial, data center, mobility, and consumer sectors globally. Where our business activities involve the processing of personal data of individuals in other jurisdictions with applicable data protection laws (including but not limited to Singapore's PDPA, Japan's APPI, or applicable US state privacy laws), we endeavour to honour the relevant rights and obligations prescribed by those frameworks.

13. Cookies and Similar Technologies

Our Site uses cookies and analogous tracking technologies to enhance functionality, analyze usage patterns, and improve the overall user experience. A detailed explanation of the types of cookies we use, their purposes, durations, and how to manage your cookie preferences is provided in our separate Cookie Policy, available on our Site.

In summary, we use the following categories of cookies: strictly necessary cookies required for Site operation; analytical cookies for understanding how visitors interact with the Site; and functional cookies for retaining user preferences. We do not currently use cookies for third-party advertising or behavioral profiling beyond what is necessary for legitimate analytics.

14. Third-Party Links and External Platforms

Our Site and communications may contain links to third-party websites, social media platforms (including LinkedIn and X), industry publications, and partner organizations. These third-party sites are not governed by this Policy, and HrdWyr accepts no responsibility or liability for their privacy practices. We encourage you to review the privacy notices of any third-party sites you visit.

15. Contact Us

If you have any questions, concerns, or requests relating to this Privacy Policy or the manner in which HrdWyr processes your personal information, please contact us at:

HrdWyr Ventures Private Limited

Ground Floor, Workhub by Novel Office, Graphite India Main Road,
Doddanakundi Industrial Area, Whitefield, KEB Colony,
Mahadevapura, Bengaluru, Karnataka – 560048, India

Website: www.hrdwyr.com

LinkedIn: [linkedin.com/company/hrdwyr](https://www.linkedin.com/company/hrdwyr)

X: x.com/HrdWyr_Ventures

We are committed to resolving all legitimate privacy-related concerns promptly and transparently. If you are not satisfied with our response, you may have the right to escalate your concern to the relevant data protection supervisory authority in your jurisdiction.

16. Updates to This Privacy Policy

HrdWyr reserves the right to update or amend this Privacy Policy from time to time to reflect changes in our business operations, technology practices, legal obligations, or regulatory requirements. The revised Policy will be posted on our Site with an updated "Last Revised" date at the top of the document. For material

changes, we may additionally provide notice through our website homepage or through direct communication where we hold your contact details.

We encourage you to review this Policy periodically. Your continued use of the Site or engagement with HrdWyr's products and services after the posting of changes constitutes your acceptance of the revised Policy. If you do not agree with the updated terms, please discontinue use of our Site and contact us if you wish to exercise any of your rights under Section 10.

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