

Privacy Policy

We are committed to complying with provisions of all applicable laws, including the Information Technology Act, 2000 and Digital Personal Data Protection Act, 2023 with respect to collection, processing, use and storage of information and data.

This privacy policy will explain how our organisation, Pinnacle Finserv Advisors Pvt. Ltd. (referred to here as “MyGSTcafe”), uses the personal data we collect from you when you use our services. Please note that MyGSTcafe provides several products and services, each with their own personal data processing needs, some of which are more extensive than others. The personal data we collect from you is limited to the specific products and services you have signed up for, and therefore, some clauses in this privacy policy may not be applicable to you.

1. What data do we collect?

It is important to note that this privacy policy covers the processing of personal data only, and not business data. Personal data refers to information that is related to an identifiable individual. This may include information such as name, address, contact details, and other identifying information. Personal data is typically used to identify, contact, or locate an individual, or to provide personalized services to that individual. Business data, on the other hand, refers to information that is related to a business or organization. This may include information such as financial data, sales data, customer data, inventory data, and other information related to the operations of the business. Business data is typically used to understand the performance of the business, make informed decisions, and improve operations.

The main difference between personal data and business data is that personal data is related to individuals, while business data is related to the operations of a business. Personal data is typically subject to more stringent privacy regulations, as it is often sensitive and can be used for malicious purposes if mishandled. Business data, while also important, is typically less sensitive and may be subject to different regulations and standards.

To provide our services, MyGSTcafe Network collects the following personal data:

Information you provide:

- Personal information (name, email address, physical address, phone number)
- Unique identification number, which includes a permanent account number (PAN), Goods and Services Tax Identification Number (VAT), or Taxpayer Identification Number (TIN). Note that unique identification numbers related to business entities are not personal data.

- Sensitive personal information (your password, financial information that includes account details, credentials and transaction data)

Your usage:

- Information on how you use our products and services, such as pages visited and average time spent on MyGSTcafe's platform.
- Information from and about the computers, phones, or other devices you use to access our products and services, and we combine this information across different devices you use. This information includes device attributes (such as the operating system, hardware and software versions, and browser type), device identifiers (such as unique identifiers and device IDs), network and connections (such as your mobile phone number and IP address) and cookie data (such as information on your preferences and cookie ID).

Transaction information:

- To provide our products and services, MyGSTcafe accesses and collects information on the status of the fulfilment of transactions

Information from partners:

- Trading partners, banks and other financial institutions can send us your information, allowing MyGSTcafe to provide our products and services to you.

2. How do we collect your data?

You directly provide MyGSTcafe with most of the data we collect. We collect data and process data when you:

- Register online or sign up for any of our products or services
- Voluntarily complete a customer survey or provide feedback by contacting us via email or phone.
- Use or view our platform via your browser's cookies or web beacons.

MyGSTcafe may also receive your data indirectly from the following sources:

- Our trading partners with whom MyGSTcafe is doing business
- Third-party service providers that help us analyse certain online activities, such as measuring the performance of MyGSTcafe's online campaigns or visitor activity.

3. How will we use your data?

MyGSTcafe will not sell or rent your data to any other party, for any reason, at any time.

MyGSTcafe collects your data so that we can:

- Provide you with our products or services and manage your account.
- Share marketing communications and newsletters, contact you with special offers on other products and services we think you might like and let you know about our policies and terms. We also use your information to respond to you when you contact us.
- Analyse your usage of MyGSTcafe's products and services
- Deliver any administrative notices, alerts and communications to you that are relevant to your use of our products or services
- Fulfil your requests for certain products and services.
- Enforce MyGSTcafe's terms of use.
- Use the information we have to develop, test and improve our products and services, including by conducting surveys and research and testing and troubleshooting new products and services.

Your information is shared with others in the following ways:

- We also work with third-party contractors providing MyGSTcafe services to operate our products and services. We share your personal information with these third-party contractors to operate our products and services and require them to be bound by the same privacy restrictions described in this privacy policy. For the products related to GST Compliance, GST Returns or GST APIs, the end customer data may be shared with third parties [only to the entities in India] and only to the extent permissible under the applicable laws.
- We may use third-party service providers to provide advertising, measurement, marketing and analytics services to MyGSTcafe, and these providers may use cookies to provide those services to us. We do not share any personal information about our customers with these third-party service providers, and these service providers do not collect any personal information on MyGSTcafe's behalf.

Information sharing required by law:

- MyGSTcafe reserves the right to disclose your personal information when: it is necessary and appropriate to enforce our rights against you or in connection with a breach of this privacy policy or with MyGSTcafe's terms of use; to prevent prohibited or illegal activities; or when required by any applicable law, rule, regulation, subpoena, or any other legal process or request. MyGSTcafe retains sole discretion in determining whether such disclosure is necessary or appropriate.

Transfer of ownership:

- If the ownership or control of all or parts of our products and services or their assets changes, we may transfer your information to the new owner.
- In case of a sale, acquisition, merger, re-organisation or other transfer involving MyGSTcafe, your information may be transferred to a third party upon your authorisation which will not be unreasonably withheld. This is to ensure the continuation of the processing of transactions.
- Should such a transfer occur, MyGSTcafe will use its best efforts to require that the new combined entity will follow this privacy policy with respect to your personal information, as and to the extent required by applicable law, and to require that you receive prior notice if your data could be used in a manner that is contrary to this privacy policy.

4. How do we store your data?

MyGSTcafe stores your data in a secure third-party facility. Our databases are protected from general employee access, both physically and logically.

MyGSTcafe uses a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain your online session's security and protect accounts and systems from unauthorised access. When you register for our products and services, MyGSTcafe requires you to set a password for your privacy and security. To access your account, we also generate a pseudonymous username to protect your privacy.

From the time you submit your login information, including your username and password, the communication between your device and MyGSTcafe is encrypted using secure socket layer (SSL) technology. SSL enables you and our systems to communicate in a way that is designed to prevent eavesdropping, tampering and message forgery. In addition, SSL encryption protects data transmissions between your browser and MyGSTcafe's servers, such as your registration information for our products and services and your account credentials.

MyGSTcafe will keep your personal information and transaction data until it is no longer necessary to provide our products and services. This is a case-by-case determination that depends on the nature of the data, why it is collected and processed, and relevant legal or operational retention needs. **The end customer data shall be retained for 7 years or such other period mandated by the applicable laws.** MyGSTcafe stores all transaction data and identifiable information related to those transactions separately. Once the case-by-case determination has been made, or upon your request to delete your data, whichever is earlier, we will delete your data by permanently expunging all identifiable information from MyGSTcafe's primary production servers, and further access to your account will not be possible. As part of MyGSTcafe's "privacy by design" strategy, we will also promptly disconnect any connection MyGSTcafe had established to your account information and delete all account credentials. Once this process is

complete, anonymised data, consisting of aggregated data and any remaining transactional or other data that has been stripped of any identifiable information, may remain on MyGSTcafe's production servers indefinitely.

Separately, in order to improve our products and services, MyGSTcafe also stores pseudonymised and anonymised data derived from the data we collect from you. Data pseudonymisation is the process of replacing personal information with a pseudonym or code. This makes it much harder for anyone who may see the data to identify the actual person behind the data. Pseudonymisation helps to protect privacy while still allowing the data to be used for research or analysis purposes.

Data anonymisation is the process of removing or obscuring personally identifiable information from a dataset so that the individuals represented in the data cannot be identified. This is typically done by replacing or removing any direct identifiers, such as names, addresses, or social security numbers, and aggregating or generalizing the remaining data so that it cannot be linked back to any specific individual. The purpose of data anonymisation is to protect the privacy and confidentiality of individuals while still allowing the data to be used for research, analysis, or other purposes. Anonymised data can be used to identify trends or patterns in a population without revealing any personal information about the individuals in that population.

Your data may also remain on a backup server or other storage media. We keep these backups to ensure MyGSTcafe's continued ability to provide our products and services in the event of malfunction or damage to MyGSTcafe's primary production servers. MyGSTcafe will also keep audit data on its servers to comply with our legal obligations.

However, it is important to understand that these precautions apply only to MyGSTcafe's products, services, websites and systems. While MyGSTcafe will have contractual agreements with third parties around data security, we do not exercise any control over how your information is stored, maintained or displayed by third parties or on third-party sites.

5. Marketing

MyGSTcafe would like to send you information about our products and services that we think you might like.

If you have agreed to receive marketing, you may always opt-out at a later date.

You have the right at any time to stop MyGSTcafe from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please email at sales@mygstcafe.com

6. What are your data protection rights?

MyGSTcafe would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request MyGSTcafe for copies of your personal data. We may charge you a small fee for this request

The right to rectification – You have the right to request that MyGSTcafe correct any information you believe is inaccurate. You also have the right to request MyGSTcafe to complete the information you believe is incomplete. MyGSTcafe shall not be responsible for the authenticity of the personal information or sensitive personal data or information supplied by you.

The right to not provide information – You have the option not to provide data or information that MyGSTcafe seeks to collect. In such a situation, MyGSTcafe shall have the option not to provide products or services for which we sought to collect your information.

The right to withdraw consent for processing – You have the right to request that MyGSTcafe restrict the processing of your personal data by withdrawing your consent given earlier to us, with certain conditions. You must send such a withdrawal of consent to MyGSTcafe in writing. In case of your withdrawal of consent, MyGSTcafe shall have the option not to provide products or services for which your consent was sought.

The right to data portability – You have the right to request that MyGSTcafe transfer the data that we have collected to another organisation or directly to you under certain conditions.

The right to erasure – You have the right to request that MyGSTcafe erase your personal data under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: arjit.gupta@pinnaclefsa.co.in

7. Adherence to GSP-GSTN Agreement

In addition to the commitments made under this Privacy Policy, MyGSTcafe affirms its obligations under the Goods and Services Tax Suvidha Provider (GSP) agreement executed with the Goods and Services Tax Network (GSTN). As a GSP duly appointed by GSTN, MyGSTcafe is bound by the terms of the said agreement, including but not limited to compliance with all directives, guidelines, and standards prescribed by GSTN from time to time in relation to data privacy, data security, and restricted access or usage of taxpayer data. Accordingly, MyGSTcafe shall not store, access, process, or share taxpayer data except as explicitly permitted under applicable laws and the GSP-GSTN agreement,

and only with the taxpayer's consent where required. All data accessed or processed in the capacity of a GSP shall be handled strictly in accordance with the privacy and confidentiality requirements laid down by GSTN and shall be used solely for the intended and authorized purpose.

8. Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology. Our cookies are encrypted so that only MyGSTcafe can interpret the information stored in them.

Our websites do not allow cookies of third parties.

9. How do we use cookies and web beacons?

MyGSTcafe uses cookies and web beacons in a range of ways to improve your experience on our websites, including:

- Keeping you signed in.
- Understanding how you use our website.
- Track and store preferential information about you.
- To personalise the content shown to you through our website, for example, by limiting the number of times you see certain information or to help determine the information or preference settings that help us serve you better.

10. What types of cookies do we use?

There are a number of different types of cookies; however, our website uses:

- Functionality – MyGSTcafe uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and the location you are in. Only first-party cookies are used.

11. How to manage cookies

You can set your browser not to accept cookies. However, in a few cases, some of our website features may not function as a result.

12. Privacy policies of other websites

MyGSTcafe's websites and platforms contain links to other websites. Our privacy policy applies only to our websites, products and services, so if you click on a link to another website, you should read their privacy policy.

13. Name and contact details of grievance officer

Arjit Gupta

Regal Building, Mall Road, Kanpur

Phone: [+91-8114018344](tel:+91-8114018344)

Email: arjit.gupta@pinnaclefsa.co.in

14. Changes to our privacy policy

MyGSTcafe keeps its privacy policy under regular review and places any updates on this webpage. This privacy policy was last updated on 5th January 2025.

15. How to contact us

If you have any questions about MyGSTcafe's privacy policy or the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: arjit.gupta@pinnaclefsa.co.in