

PRIVACY POLICY

Last Updated: March 29, 2026

1. INTRODUCTION AND SCOPE

Woohl Pvt. Ltd. ("Woohl", "we", "us", or "our") respects your privacy and is unequivocally committed to protecting your personal data. Woohl operates a comprehensive digital ecosystem, which includes an online social commerce marketplace, creator monetization tools, affiliate marketing programs, and advanced Artificial Intelligence (AI) Software-as-a-Service (SaaS) solutions designed for enterprise and Business-to-Business (B2B) clients.

This comprehensive Privacy Policy outlines our extensive practices regarding the collection, use, processing, storage, transfer, and disclosure of personal information when you access, browse, or use our website, <https://www.woohl.com>, our mobile applications, application programming interfaces (APIs), AI tools, and any related services (collectively referred to as the "Platform").

1.1 Legal Framework and Compliance

This Privacy Policy is published and maintained strictly in compliance with applicable Indian laws, including but not limited to:

- The Information Technology Act, 2000 ("IT Act").
- The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("SPDI Rules").
- The Digital Personal Data Protection Act, 2023 ("DPDPA").
- Relevant guidelines issued by the Reserve Bank of India (RBI) regarding payment data tokenization and storage.
- Guidelines issued by the Indian Computer Emergency Response Team (CERT-In) regarding cyber security incident reporting.

1.2 Applicability

This Privacy Policy applies to all individuals and entities that interact with our Platform, including but not limited to:

- **"Buyers"** browsing or purchasing physical or digital products.
- **"Sellers"** listing physical or digital merchandise on the marketplace.
- **"Creators"** utilizing our platform to publish content and monetize their audience.
- **"Affiliates"** promoting platform listings or subscriptions.
- **"Enterprise Clients"** and their authorized employees using our AI SaaS tools.
- **"Visitors"** who simply browse the Platform without creating an account.

By accessing our Platform, creating an account, making a purchase, subscribing to a service, or otherwise interacting with us, you acknowledge that you have read this Privacy Policy, understand its contents, and expressly consent to the collection, use, processing, and disclosure of your personal data in accordance with the terms laid out herein. If you do not agree with any part of this Privacy Policy, you must immediately cease using the Platform.

2. THE INFORMATION WE COLLECT

We collect various categories of personal and non-personal information to provide, personalize, and continually improve our Platform and services. We only collect data that is necessary for the stated purposes. The types of information we collect depend on how you interact with our Platform.

2.1 Information You Actively Provide to Us

When you register for an account, subscribe to a newsletter, complete a purchase, or contact our support team, we collect the following:

- **Identity Data:** First name, last name, maiden name (if applicable), title, date of birth, age, and gender.
- **Contact Data:** Primary and secondary email addresses, mobile phone numbers, residential address, billing address, and delivery/shipping address (including State, Province, ZIP/Postal code, City, and geographical landmarks).
- **Financial Data:** Partial payment details. *(Note: Woohl does not store full credit card, debit card, or UPI PIN details. All financial transactions are securely processed by Razorpay. We only store payment status, transaction IDs, and masked card identifiers).*
- **KYC and Business Data (For Sellers, Creators, Affiliates, and B2B Clients):** To comply with tax, anti-money laundering (AML), and platform safety regulations, we strictly collect Know Your Customer (KYC) documentation. This includes bank account details (account number, IFSC code, account holder name), GSTIN (Goods and Services Tax Identification Number), Permanent Account Number (PAN) card copies, Aadhaar card numbers (voluntarily provided for identity verification), business registration certificates (CIN), and director/partner details.
- **Account and Profile Data:** Username, password (stored in a salted and hashed format), profile picture, biography, preferences, wishlist items, saved creators, purchase history, and subscription history.
- **User-Generated Content (UGC) Data:** Product reviews, comments, chat messages, forum posts, blog contributions, support tickets, and any images or videos you upload to the Platform.
- **AI Interaction Data:** For users of our AI SaaS tools, we collect the exact text, files, images, or parameters you input into our AI prompts ("Input Data"), as well as the feedback you provide regarding the generated AI outputs ("Output Data").

2.2 Information We Collect Automatically

As you navigate through and interact with our Platform, we automatically collect technical data regarding your equipment, browsing actions, and patterns. We collect this data using cookies, server logs, web beacons, pixels, and other similar tracking technologies.

- **Technical Data:** Your Internet Protocol (IP) address, browser type and version, browser plug-in types and versions, time zone setting, geolocation data (if permitted by your device settings), operating system and platform, mobile device type, unique device identifiers (UDID, IMEI, MAC address), and mobile network information.
- **Usage Data:** Detailed information about how you use our Platform, including the Uniform Resource Locators (URLs) clickstream to, through, and from our Platform (including date and time), products or services you viewed or searched for, page

response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

2.3 Information from Third-Party Sources

We may receive personal data about you from various third parties and public sources, including:

- **Social Media Platforms:** If you choose to register or log in via third-party platforms (e.g., Google, Facebook, Apple, Twitter), we will receive specific profile information as permitted by the terms of the third-party provider, such as your name, email address, and profile picture.
- **Payment Processors:** Transaction confirmations, fraud risk scores, and dispute statuses from our payment gateway, Razorpay.
- **Logistics Partners:** Delivery status updates, proof of delivery signatures, and tracking milestones from our logistics aggregator, Shipmozo, and affiliated couriers.
- **Public Databases and Credit Bureaus:** For B2B Enterprise clients and Sellers, we may verify GST details, corporate filings, or creditworthiness using publicly available government databases (e.g., Ministry of Corporate Affairs portals) or credit reporting agencies.

3. HOW WE USE YOUR INFORMATION

We will only use your personal data when the law allows us to. We use the collected data for various operational, business, and compliance purposes, strictly adhering to the principles of purpose limitation and data minimization under the DPDPA 2023.

3.1 To Provide and Manage Platform Services

- To register you as a new user (Buyer, Seller, Creator, Affiliate, or B2B Client).
- To manage your account, profile, and preferences.
- To process and deliver your orders, manage payments, fees, and charges, and collect and recover money owed to us.
- To facilitate seamless communication between Buyers and Sellers regarding order status or custom requirements.
- To provide access to our Creator Tools, enabling content publication, audience interaction, and tip/subscription processing.

3.2 For Logistics and Fulfillment

- To arrange for the shipping and delivery of physical goods via Shipmozo and their network of couriers.
- To process returns, exchanges, and reverse pickups efficiently.

3.3 To Improve our AI SaaS Tools and Platform Functionality

- To utilize data analytics to improve our website, products/services, marketing, customer relationships, and overall user experiences.
- To troubleshoot software bugs, perform data analysis, testing, system maintenance, support, reporting, and hosting of data.
- **AI Training Notice:** We may use aggregated, anonymized, or pseudonymized Input

Data and Output Data generated through our AI SaaS tools to train, fine-tune, and improve our proprietary machine learning models. *Enterprise Clients may explicitly opt out of having their specific corporate data used for cross-tenant AI model training by adjusting their admin settings or contacting their account manager.*

3.4 For Marketing, Advertising, and Communication

- To send you transactional emails (e.g., order confirmations, tracking numbers, password resets).
- To send you periodic newsletters, promotional offers, and updates regarding new features or products. You maintain the right to opt out of marketing communications at any time.
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve.
- To utilize remarketing services (via Google Ads, Meta Pixels, etc.) to show you targeted advertisements across the internet based on your prior interactions with Woohl.

3.5 For Legal Compliance, Security, and Fraud Prevention

- To verify your identity and conduct necessary KYC, AML, and background checks as mandated by Indian law.
- To comply with our legal and regulatory obligations, including tax reporting (GST filings) and responding to lawful requests from law enforcement agencies, courts, or government bodies.
- To monitor platform activity to detect, prevent, and mitigate fraud, unauthorized access, intellectual property infringement, and other illegal activities.
- To enforce our Terms of Service, Seller Agreements, Affiliate Agreements, and other legal policies.

4. HOW WE SHARE AND DISCLOSE YOUR INFORMATION

Woohl strictly does not sell, rent, or trade your personal data to third parties for independent commercial gain. However, to operate our complex ecosystem effectively, we must share your information with trusted third-party service providers and partners under strict confidentiality agreements.

4.1 Payment Processors (Razorpay)

All financial transactions on Woohl are securely processed through our designated, RBI-authorized payment aggregator, **Razorpay**. When you initiate a transaction, your billing details, order value, and contact information are shared with Razorpay. Razorpay processes your payment instrument details independently. We strongly advise you to review Razorpay's Privacy Policy at: <https://razorpay.com/privacy-policy/>.

4.2 Logistics and Fulfillment Partners (Shipmozo)

To fulfill orders for physical products, we share your exact name, delivery address, phone number, and package details (weight, dimensions, item type) with our logistics aggregator, **Shipmozo**, and their network of courier partners (including but not limited to Delhivery,

BlueDart, Ecom Express, and Xpressbees).

4.3 Sellers and Vendors

If you are a Buyer purchasing a physical or digital product, we must share your order details (Name, Shipping Address, Contact Number, and ordered items) with the specific independent Seller you purchased from. This is exclusively for the purpose of picking, packing, and fulfilling your order. Sellers are contractually bound by our Seller Agreement to use this data *solely* for fulfillment and are strictly prohibited from using your data for off-platform marketing or unauthorized sharing.

4.4 Cloud Hosting and IT Infrastructure Providers

Your data is securely stored on cloud servers hosted by top-tier infrastructure providers (e.g., Amazon Web Services (AWS) or Google Cloud Platform (GCP)). These providers are contractually obligated to implement rigorous technical and organizational security measures to protect your data. All user data generated within India is stored on servers physically located within the territorial jurisdiction of India, in compliance with data localization directives.

4.5 Marketing, Analytics, and Advertising Partners

We share anonymized, aggregated, or pseudonymized data with third-party analytics and marketing tools, including Google Analytics, Firebase, Meta (Facebook/Instagram), and Mailchimp. This helps us understand platform traffic, optimize user journeys, and manage our email marketing campaigns.

4.6 Business Transfers, Mergers, and Acquisitions

In the event that Woohl Pvt. Ltd. undergoes a corporate restructuring, merger, acquisition by another company, or sale of all or a portion of its assets, your personal data may be among the assets transferred. We will notify you via email and/or a prominent notice on our Platform of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

4.7 Legal Authorities and Law Enforcement

We reserve the right to disclose your personal information if we are required to do so by law, or if we believe in good faith that such action is absolutely necessary to:

- Comply with a legal obligation, court order, subpoena, or warrant.
- Comply with requests from government agencies, including the Indian Police, Cyber Crime Cells, the Income Tax Department, or the Goods and Services Tax (GST) authorities.
- Protect and defend the legal rights, property, or safety of Woohl Pvt. Ltd., our users, our employees, or the general public.
- Investigate, prevent, or take action regarding suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our Terms of Service.

5. DATA SECURITY AND PROTECTION MEASURES

We take the security of your personal data extremely seriously. We have implemented and maintain comprehensive, commercially reasonable technical, physical, and administrative security measures designed to provide robust protection against unauthorized access, alteration, disclosure, accidental loss, or destruction of your data.

Our security protocols include, but are not limited to:

- **Encryption:** All data transmitted between your browser/app and our servers is encrypted using industry-standard Secure Socket Layer (SSL) / Transport Layer Security (TLS) encryption. Sensitive data (such as passwords and API keys) stored in our databases is cryptographically hashed and salted.
- **Access Controls:** Access to personal data is strictly restricted to Woohl employees, contractors, and agents who have a legitimate "need to know" in order to process it on our behalf. These individuals are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- **Vulnerability Scanning and Penetration Testing:** Our platform infrastructure undergoes regular automated vulnerability scanning and periodic manual penetration testing to identify and remediate potential security loopholes.
- **Incident Response Plan:** We maintain a formal incident response plan to promptly address any suspected data breach. In the highly unlikely event of a data breach, we will notify you and any applicable regulator (such as CERT-In) of a breach where we are legally required to do so within the mandated timeframes.

Disclaimer: Despite our exhaustive efforts, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

6. DATA RETENTION POLICY

We will only retain your personal data for as long as is reasonably necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements.

Our general retention guidelines are as follows:

- **Account Data:** Maintained for the duration your account is active. If you delete your account, we will purge your profile data within 60 days, barring data required for legal compliance.
- **Transaction and Financial Records:** Retained for a minimum of eight (8) years as mandated by the Companies Act, 2013, and various Indian tax laws (GST, Income Tax).
- **KYC Documentation:** Retained for the duration of your active business relationship with us and for a period of five (5) years post-account closure, in compliance with anti-money laundering regulations.
- **Grievance and Dispute Records:** Retained for specific periods necessary to resolve disputes, prevent fraud, or enforce our agreements.

When personal data is no longer necessary for the purposes for which it was collected or retained, we will securely delete, permanently destroy, or completely anonymize the data so that it can no longer be associated with you.

7. YOUR RIGHTS UNDER THE DIGITAL PERSONAL DATA PROTECTION ACT, 2023 (DPDPA)

As a resident of India, the Digital Personal Data Protection Act, 2023 grants you specific, powerful rights regarding your personal data. Woohl is committed to facilitating the exercise of these rights:

1. **Right to Access Information:** You have the right to request a summary of the personal data we hold about you, the processing activities undertaken with respect to that data, and the identities of all other Data Fiduciaries and Data Processors with whom we have shared your data.
2. **Right to Correction and Updating:** You have the right to request the correction of inaccurate, misleading, or incomplete personal data. You can update most of your basic information directly through your account settings dashboard.
3. **Right to Erasure (Right to be Forgotten):** You have the right to request the deletion of your personal data when it is no longer necessary for the purpose for which it was processed, or if you withdraw your consent. *(Note: This right is not absolute and is subject to our legal obligations to retain certain financial and transactional records).*
4. **Right to Withdraw Consent:** Where we rely on your consent to process your personal data (e.g., for marketing emails), you have the right to withdraw that consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
5. **Right to Nominate:** In the event of your death or incapacity, you have the right to nominate another individual to exercise your data rights on your behalf.
6. **Right to Grievance Redressal:** You have the right to readily available means of grievance redressal provided by us. If you are unsatisfied with our response, you have the right to escalate the complaint to the Data Protection Board of India.

How to Exercise Your Rights:

To exercise any of the above rights, please submit a formal written request to our Data Protection Officer / Grievance Officer at hello@woohl.com. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data. We endeavor to respond to all legitimate requests within thirty (30) days.

8. COOKIES AND TRACKING TECHNOLOGIES

Our Platform utilizes cookies, web beacons, pixels, and other tracking technologies to distinguish you from other users. This helps us provide you with an optimized, highly personalized experience when you browse our Platform and allows us to improve our site.

These technologies collect data regarding your device, browser, and navigation patterns. While some cookies are strictly necessary for the technical operation of the platform (like keeping your shopping cart active), others are used for analytical and marketing purposes.

For an exhaustive explanation of the exact types of cookies we use, the third parties who set them, and how you can manage or disable your cookie preferences via your browser settings, please refer to our dedicated **Cookie Policy**.

9. CHILDREN'S PRIVACY

The Woohl Platform is not designed, targeted, or intended for use by children under the age of eighteen (18) years. We do not knowingly collect, process, or maintain personally identifiable information from anyone under 18 without verifiable parental consent.

If you are a parent or legal guardian and believe that your child has provided us with personal data without your consent, please contact our Grievance Officer immediately. If we become aware that we have collected personal data from a child under the age of 18 without verifiable parental consent, we will take immediate steps to completely remove that information from our servers and terminate the associated account.

10. THIRD-PARTY LINKS

Our Platform may occasionally contain links to third-party websites, plug-ins, affiliate networks, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or data handling practices. When you leave our Platform, we strongly encourage you to read the privacy policy of every website you visit.

11. CHANGES TO THIS PRIVACY POLICY

We keep our Privacy Policy under regular review to ensure it accurately reflects our evolving business practices, technological advancements, and changes in Indian legal and regulatory requirements.

We reserve the right to update or modify this Privacy Policy at any time. If we make significant material changes—such as changes to how we process your data or whom we share it with—we will provide prominent notice by posting a conspicuous banner on our website, updating the "Last Updated" date at the top of this document, and optionally sending an email notification to registered users. Your continued use of the Platform following the posting of any revised Privacy Policy constitutes your explicit acceptance of the updated terms.

12. DATA PROTECTION OFFICER & GRIEVANCE REDRESSAL

In strict accordance with the Information Technology Act, 2000, the SPDI Rules, 2011, and the Digital Personal Data Protection Act, 2023, Woohl Pvt. Ltd. has appointed a dedicated Grievance Officer / Data Protection Officer to address any discrepancies, grievances, or questions you may have regarding the processing of your personal data.

Please direct all privacy-related inquiries, data rights requests, or complaints to:

Name: The Grievance Officer / Data Protection Officer

Company: Woohl Pvt. Ltd.

Registered Office Address: Sec-15, Rohini, Delhi, India

Email Address: hello@woohl.com

Phone Number: +91 8178709760

Operating Hours: 10:00 AM to 6:00 PM IST (Monday through Friday, excluding public holidays)

Escalation Matrix

1. **Level 1 (Primary Contact):** Submit your grievance to hello@woohl.com. Our support team will acknowledge your request within 24 hours and aim to resolve it within 15 days.
2. **Level 2 (Escalation):** If your grievance is not resolved to your satisfaction within 15 days, or if you wish to exercise your specific rights under the DPDPA, please state "ESCALATION - PRIVACY RIGHTS" in the subject line of your email to ensure direct routing to our Legal/Compliance team.
3. **Level 3 (Regulatory Body):** If you remain dissatisfied with our final resolution, you maintain the legal right to lodge a formal complaint with the Data Protection Board of India, as established under the DPDPA 2023.