

GREENUSS WELLNESS PRIVATE LIMITED – PRIVACY STATEMENT (Compliant with the Digital Personal Data Protection Act, 2023)

1. Introduction: This Privacy Statement is issued by Greenuss Wellness Private Limited (“Greenuss”, “Company”, “we”, “us”, or “our”), a company incorporated under the Companies Act, 2013 and having its registered office at KV 21, Krishna Vihar, Near HDFC, Patrapada, Khorda, Bhubaneswar, Odisha – 751019, India.

Greenuss acts as the Data Fiduciary for the personal data collected and processed through its website, enrolment forms and business operations.

This Privacy Statement explains how we collect, use, store, share, and protect your digital personal data in compliance with the Digital Personal Data Protection Act, 2023 (“DPDP Act”) and other applicable Indian laws.

By providing your personal data and using our services, you consent to the collection and processing of your data in accordance with this Privacy Statement.

2. Important Notice: Please read this Privacy Statement carefully before providing your personal data. By providing your consent, you agree to the collection and use of your data for the purposes described herein.

This Privacy Statement may be updated from time to time. Any changes will be posted on our website and will become effective from the date of publication.

3. Definitions: With regards to this Privacy Statement, the terms will carry the same meaning as defined herein below. Terms which are not defined herein but are defined elsewhere in our policies/ literature will have that meaning assigned to them therein, if the context allows so. Further, the words not defined herein or elsewhere will have their dictionary meaning.

- “Account” means a unique account created by you to access our Services or parts thereof through our Website.
- “Authorized Person” also known as Grievance Officer refers to the designated individual appointed by Greenuss Wellness to address subject’s grievances, concerns, or inquiries related to personal data processing. He/ she is responsible for ensuring compliance with applicable data protection laws, responding to user requests, and handling their complaints in a timely manner.
- “Country” refers to the territory of India.
- Data Fiduciary: Greenuss Wellness Private Limited, which determines the purpose and means of processing personal data.
- “Data Principal” refers to an individual whose personal data is collected, processed, or stored by Greenuss Wellness. This includes any person to whom the personal data relates and who has rights over such data under applicable laws.
- “Personal Data”: refers to your data through which you can be identified or pertains to you. Personal Data includes but shall not be limited to your complete name, gender, date of birth, contact details, address, identity proof, bank account etc. For the purpose and usage of this Statement, your “personal data” shall include the digital personal data.

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- **“Personal data breach”** means any unauthorised processing of personal data or disclosure, acquisition, sharing, use, alteration, destruction or loss of access to personal data in violation of this privacy statement, that compromises the confidentiality, integrity or availability of personal data.
- **“Processing”**: this refers to any operation or set of operations, conducted wholly or partially by automated means, that involves handling digital personal data. This includes, but is not limited to, gathering, recording, organizing, structuring, storing, adapting, retrieving, utilizing, aligning, combining, indexing, sharing, disseminating, limiting, erasing, or otherwise making data accessible or deleting it.
- **“Service Provider”** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company who facilitate us in providing our Services or to perform services related to the service or to assist the Company in analyzing how the service is being used.

4. Personal Data We Collect: We may collect the following personal data at the time of enrolment or during your association with us as an Independent Promoter or user:

- **Full name**
- **Date of birth**
- **Gender**
- **Address**
- **Email address**
- **Mobile number**
- **PAN details**
- **Aadhaar details** (where required for identity verification or regulatory compliance)
- **Bank account details** (for payment processing)

We collect only such data that is necessary for lawful business, contractual, and regulatory purposes. Our services are intended only for individuals aged 18 years or above. We do not knowingly collect personal data of minors.

5. Purpose of Processing: Your personal data is processed for the following purposes:

- Creation and management of your account
- Order processing and product delivery
- Payment processing, commission disbursement and tax compliance
- Conducting training programs, events, and webinars
- Sharing promotional and marketing communications
- Compliance with applicable laws and regulatory requirements
- Internal business administration and record keeping

We process personal data only for lawful purposes and only to the extent necessary.

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6. Data Sharing: We may share personal data with:

- Payment service providers for commission processing
- Back-office service providers for account management
- Accounting service providers for financial compliance
- Logistics partners for order delivery
- Regulatory authorities where required by law

Such third parties act as Data Processors and are contractually bound to process data only as per our instructions and applicable law.

For referral and business network purposes, limited information such as name, contact details, and performance statistics may be visible within the promoter network.

7. Cookies: Our website may use cookies to improve user experience, remember login details, and analyze website usage. Cookies may collect limited personal data such as login identifiers. Users may choose to disable cookies through browser settings.

8. Data Retention: We retain personal data only for as long as necessary to:

- Fulfil the purposes for which it was collected
- Comply with legal, tax, and regulatory requirements
- Maintain business and financial records

Once the data is no longer required, it will be securely deleted.

9. Data Security: We implement reasonable security safeguards including technical, administrative, and physical controls to protect personal data against unauthorized access, misuse, loss, or disclosure.

While we strive to protect your data, no system is completely secure. Users are encouraged to protect their login credentials.

10. Cross-Border Transfer of Personal Data: In the course of providing our services, certain personal data may be transferred to, stored, or processed outside India, including through the use of cloud servers, technology platforms, payment gateways, or other service providers located in foreign jurisdictions. Such transfers shall be undertaken only in accordance with the provisions of the Digital Personal Data Protection Act, 2023 and any applicable notifications issued by the Government of India restricting transfer to specific countries or territories.

We ensure that any third parties receiving personal data outside India maintain reasonable security safeguards and process such data only for specified and lawful purposes as instructed by us.

By providing your personal data, you acknowledge and consent to such transfer, storage, and processing where necessary for service delivery, payment processing, system administration, or business operations

11. Your Rights Under the DPDP Act: As a Data Principal, you have the following rights:

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- Right to access information about your personal data
- Right to correction and updating of inaccurate data
- Right to erasure of personal data, subject to legal requirements
- Right to withdraw consent at any time
- Right to grievance redressal
- Right to nominate another person to exercise your rights in case of death or incapacity

To exercise your rights, you may contact us using the details provided below.

12. Withdrawal of Consent: You may withdraw your consent at any time by contacting us. Withdrawal may impact your ability to continue as an Business Promoter or to receive certain services.

13. Grievance Redressal: For any privacy-related concerns, requests, or complaints, you may contact our Grievance Officer +91-7205000500 at:

Greenuss Wellness Private Limited

Registered Office Address:

KV 21, Krishna Vihar, Near HDFC, Patrapada, Khorda, Bhubaneswar, Odisha – 751019

Email: care@greenuss.com

We will address grievances within a reasonable time.

14. Data Breach: In the event of a personal data breach, we will take appropriate remedial measures and notify the relevant authorities and affected individuals as required under applicable law.

15. Legal Disclosure: We may disclose personal data if required by law, court order, or government authority.

16. Third-Party Websites: Our website may contain links to third-party websites. We are not responsible for their privacy practices and encourage users to review their policies separately.

17. Updates to This Policy: This Privacy Statement may be updated from time to time. The latest version will always be available on our website.

Disclaimer: Greenuss will not be responsible for any incorrect, misleading, or fraudulent information that you may provide, nor will it be liable if you misrepresent yourself as another individual. In such cases, you agree to indemnify and hold Greenuss harmless from any claims, losses, damages, or liabilities arising due to the provision of incorrect information or misrepresentation on your part.

Version dated: 02nd March 2026