Privacy Notice

1. Introduction

20 Microns Limited, together with its subsidiaries, joint ventures and associate companies ("20 Microns Group"), is committed to protecting the privacy of every individual who interacts with our website, digital platforms, products, or communication channels. We understand the importance of personal data and are committed to ensuring transparency, fairness, and accountability in the manner we collect, use, store, share, and safeguard such information. This Privacy Notice describes the nature of personal data we process, the purpose and legal basis for processing, the categories of recipients to whom personal data may be disclosed, the safeguards we maintain, and your rights under the Digital Personal Data Protection Act, 2023 ("DPDP Act") and the Digital Personal Data Protection Rules, 2025 ("DPDP Rules"). By using our website or providing your personal data voluntarily, you agree to the terms of this Privacy Notice.

2. Types of Personal Data We Collect

We may collect various categories of personal data depending on how you interact with our website and services. This includes basic identification details such as your name, email address, mobile number, company name, location, and other information voluntarily submitted through forms or registrations. Additionally, when you browse our website, certain technical data such as your IP address (in anonymized form), browser type, device identifiers, operating system, referring pages, date and time of access, and browsing behaviour may be captured automatically for ensuring website functionality and security. We may also process communication-related information, such as content you submit through contact forms, email exchanges, and interaction history with our marketing or service messages. If you transact with us online, certain transactional information including order data, shipping details and payment reference numbers may also be processed (note: we do not store card or banking details).

3. How We Collect Your Personal Data

Personal data is collected through multiple channels including, but not limited to, information you provide directly via website forms, registration pages, email communications, marketing sign-up forms, and customer or vendor onboarding interactions. We also collect technical information generated automatically when you access our website through cookies, analytic tools, web beacons, and local storage functionalities. Additionally, when you interact with us on social media platforms such as LinkedIn, Instagram, YouTube, Facebook, or X, we may access publicly visible information associated with your profile or messages that you share with us. In all such cases, the data is processed solely for legitimate business or service-related purposes.

4. Legal Basis for Processing Personal Data

We process personal data only when there is a clear and lawful basis to do so in accordance with the DPDP Act and DPDP Rules. In situations where the law requires consent—such as marketing communications, optional data fields, non-essential cookies, or voluntary registrations—we rely on your freely given consent. You may withdraw such consent at any time. In other situations, we process personal data without requiring consent, where it is

necessary for providing services requested by you, ensuring website security, complying with legal obligations, preventing fraud or cybersecurity threats, responding to grievances, fulfilling statutory reporting requirements, or carrying out activities that you would reasonably expect in the course of using our website and services.

5. Purpose of Using Your Personal Data

Your personal data is used solely for purposes that are legitimate, necessary, and directly related to your engagement with us. This includes making our website functional and secure, responding to your inquiries, providing technical support, enabling account creation or logins for secure sections, fulfilling product or service requests, delivering updates or notifications, improving the user experience, analysing website performance, sending marketing communications (only where consent is obtained), managing customer or vendor interactions, and addressing grievances or complaints. We do not sell or commercially trade your personal data to any third party.

6. Cookies, Analytics, Web Beacons and Local Storage

To improve user experience, website speed, and functionality, we use various digital tools such as cookies, analytics technologies, web beacons, and local storage features. Cookies help us remember user preferences, maintain session continuity, analyse website traffic, and tailor content based on usage. Essential cookies are used strictly for website operations, while analytics and marketing cookies are used only with user consent. Web beacons are used primarily in communications such as newsletters to analyse user engagement. Local storage allows faster browsing by storing certain data in your browser. You may disable these features through your browser settings; however, doing so may impact the performance or accessibility of certain website features.

7. Social Media Interactions

If you engage with us on social media platforms, we may access limited personal data that is visible publicly, such as your profile name, picture, preferences, comments, or messages. We may also analyse interaction metrics such as likes, shares, comments, and follower activity to understand user engagement and to enhance our communication. While we process such data only to the extent necessary to manage our online presence responsibly, please note that each social media platform processes your data independently under its own privacy policy. We do not control or influence how these platforms collect, store, or use your personal data.

8. Sharing and Disclosure of Personal Data

We do not share your personal data except where strictly necessary and as permitted under law. Personal data may be shared with subsidiaries and associate companies within the 20 Microns Group for internal processing, or with authorised service providers such as IT vendors, hosting partners, cloud service providers, logistics partners, marketing agencies, or professional consultants who assist us in delivering services. All third-party processors are bound by strict confidentiality obligations and Data Processing Agreements ensuring compliance with the DPDP Act and DPDP Rules. We may also disclose personal data to governmental, regulatory, or law enforcement authorities when required under legal or compliance obligations.

9. Cross-Border Transfers of Personal Data

In certain cases, personal data may be transferred to servers, service providers, or affiliates located outside India. Such transfers are conducted only in accordance with the DPDP Act and Rules, ensuring that the receiving country is not restricted by the Government and that adequate data protection safeguards are in place. These safeguards may include contractual clauses, technical security measures, or specific consent from the data principal when required. We ensure that your personal data continues to receive an equivalent level of protection even when processed in another jurisdiction.

10. Data Retention and Erasure

We retain personal data only for as long as necessary to fulfil the specific purpose for which it was collected. For example, inquiry data is retained until the request is resolved, website logs are maintained for security monitoring periods, and marketing consent data is deleted within two months of withdrawal. Marketing interaction history is retained for a maximum of five years unless deleted earlier at your request. Statutory or regulatory data may be retained for longer periods as mandated under applicable laws. Once the retention period expires, or once the data principal exercises the right to erasure, we delete or anonymize the data unless legal requirements prevent such deletion.

11. Security and Protection of Personal Data

We implement a combination of administrative, technical, and physical security measures to protect personal data from unauthorized access, misuse, alteration, or loss. These measures include encryption, access control mechanisms, firewalls, secure servers, network monitoring tools, multi-factor authentication, data minimization practices, regular audits, vendor assessments, and incident response procedures. While no system can guarantee absolute security, we continuously update and strengthen our safeguards to meet evolving technological and regulatory standards.

12. Children's Data

Our website and services are not intended for unsupervised use by children (persons below 18 years of age). We do not knowingly collect children's personal data unless it is provided with verifiable parental or lawful guardian consent, as required under Rule 9 of the DPDP Rules. If we become aware that personal data of a child has been collected without such consent, we will take steps to delete the data promptly.

13. Your Rights as a Data Principal

Under the DPDP Act, you have several important rights regarding your personal data. These include the right to access information about the categories of personal data processed, the right to seek correction or updation of inaccurate or incomplete data, the right to request erasure of personal data when the purpose is fulfilled or consent is withdrawn, the right to nominate another person to exercise your rights in case of death or incapacity, and the right to seek grievance redressal for any concerns relating to personal data processing. You may exercise these rights by writing to the contact details provided below. If you are not satisfied with our response, you may approach the Data Protection Board of India.

14. Updates to This Privacy Notice

We may update this Privacy Notice periodically to reflect changes in law, regulatory requirements, internal policies, technological developments, or business operations. Updated versions will be posted on our website with the revised effective date. We encourage you to review this Privacy Notice regularly to stay informed about how your personal data is protected.

15. Contact Details

If you have any questions, requests, or grievances related to the processing of your personal data, please contact:

20 Microns Limited
Plot No. 9-10, GIDC Industrial Estate,
Waghodia – 391760, Vadodara, Gujarat, India

Details of Data Protection Officer :

Mr. Nitin Anerao
General Manager (IT)
Email: dpo@20microns.com