

INVIZN

PRIVACY POLICY

Version 1.0 | Effective date: **10 july 2026**

By registering on the Invizn platform, you will be asked to review and consent to this Policy in accordance with Section 5 below.

1. Introduction and Scope

This Privacy Policy ("Policy") is issued by **INVIZN PRIVATE LIMITED**, having its registered office at **Shop 10 Bhoomi Acres Phase 2, Hiranandani Estate, Kasarvadavali, Thane, Thane- 400615, Maharashtra** ("Invizn", "we", "us", "our"), and operates in its capacity as a Data Fiduciary under the Digital Personal Data Protection Act, 2023 ("DPDP Act") and the Digital Personal Data Protection Rules, 2025 ("DPDP Rules").

This Policy explains what personal data Invizn collects through invizn.ai and its associated platform ("Platform"), why it is collected, how it is used, who it is shared with, how long it is retained, and the rights available to individuals whose data is processed ("Data Principals").

This Policy applies to two categories of individuals: (a) vendors, venue owners, planners, and other business users who register on the Platform ("Registered Users"); and (b) third parties, such as a Registered User's own clients, whose personal data a Registered User uploads or inputs into the Platform in the course of using the services.

2. Key Definitions

- "Personal Data" means any data about an individual who is identifiable by or in relation to such data.
- "Processing" means any operation performed on personal data, including collection, storage, use, sharing, and erasure.
- "Data Fiduciary" means the entity that determines the purpose and means of processing personal data. Invizn acts as Data Fiduciary in respect of Registered User data.
- "Data Processor" means any entity that processes personal data on behalf of a Data Fiduciary, such as the AI and infrastructure sub-processors listed in Section 7.
- "Data Principal" means the individual to whom the personal data relates.
- "Consent Manager" means a person registered with the Data Protection Board to enable a Data Principal to give, manage, review, or withdraw consent. This framework is not yet operational as of this draft and is scheduled to become active on 13 November 2026.

3. Personal Data We Collect

3.1 Data collected directly from Registered Users

- Full name and business or venue name
- Mobile number, including where collected via WhatsApp-based onboarding
- Email address
- Business address and venue location details
- Login and account credentials
- Photographs and images uploaded to the Platform, such as venue photos, moodboards, and reference images

- Usage data, including pages visited, features used, timestamps, and device and browser information

3.2 Data uploaded by Registered Users about their own clients

Where a Registered User uses the Platform to manage or generate content for their own clients, for example a couple's names, contact number, or event preferences, Invizn processes this data as a Data Processor on behalf of the Registered User. The Registered User remains responsible, as the Data Fiduciary for that data, for its original lawful collection.

3.3 Data we do not currently collect

Invizn does not currently use website analytics or advertising trackers such as Google Analytics or Meta Pixel. Only essential cookies required for login sessions and core functionality are used. If this changes, this Policy and the cookie notice referenced in Section 12 will be updated, and a cookie consent banner will be added, before any such tool goes live.

4. Purpose of Processing

Personal data is processed only for purposes that are specific, lawful, and disclosed at the point of collection, including:

- Creating and managing Registered User accounts
- Providing the core Platform functionality, including AI-assisted image styling and design generation
- Communicating with Registered Users, including via WhatsApp, regarding onboarding, support, and service updates
- Improving and securing the Platform
- Complying with legal obligations, including responding to lawful requests from government or regulatory authorities

Personal data is not used for any purpose beyond what is disclosed at collection without obtaining fresh consent.

5. Legal Basis and Consent

Consent is the primary basis on which Invizn processes personal data. Consistent with the DPDP Act, consent collected at registration is:

- Free, specific, informed, unconditional, and unambiguous
- Captured through a single bundled "I agree" checkbox
- Accompanied by a clear, plain-language description of the personal data being collected and the purpose of processing, given at the time of collection
- Revocable at any time, as easily as it was given, through account settings or by writing to the grievance contact in Section 10

Where processing is necessary for a purpose explicitly permitted under Section 7 of the DPDP Act, for example compliance with law, Invizn relies on that legitimate use rather than consent, and the relevant notice will identify this basis.

6. Use of AI Tools and Automated Processing

The Platform uses third-party AI and machine-learning services to power image styling and design-generation features. Images and related inputs uploaded to the Platform may be transmitted to these services for processing.

- Google Gemini API and Replicate

Where feasible, data sent to AI sub-processors is limited to what is necessary for the specific styling or generation task requested by the Registered User. Invizn does not permit these sub-processors to use Registered User data to train their own general-purpose models, and will confirm this position contractually with each provider as described in Section 7.

7. Sharing of Personal Data and Sub-Processors

Personal data is shared only with the following categories of recipients, each bound by contractual confidentiality and security obligations:

- Cloud hosting and infrastructure providers
- AI and machine-learning processing providers, as listed in Section 6
- WhatsApp Business Platform and Meta, for onboarding and support communication
- RazorPay
- Government or regulatory authorities, where required by law

Personal data is not sold to any third party. A current list of active sub-processors is maintained internally and will be made available on request via the grievance contact in Section 10.

8. Cross-Border Data Transfer

Some sub-processors listed in Sections 6 and 7 may process data on servers located outside India. As of this draft, the DPDP Act does not restrict cross-border transfer except where the Central Government specifically restricts transfer to certain countries by notification, and no such restriction list had been notified as of July 2026. Invizn will monitor for any such notification and update this Policy accordingly.

9. Data Retention and Erasure

- Account data is retained for as long as the Registered User maintains an active account, plus 3months after account closure or last login, unless a longer period is required by law.
- Uploaded images and generated design outputs are retained for 3months unless the Registered User deletes them earlier or requests erasure.

Before erasure, where feasible, Registered Users will be given advance notice consistent with Rule 8 of the DPDP Rules, so that they may retrieve or export their data.

On a verified erasure request from a Data Principal, or on withdrawal of consent, the relevant personal data will be erased unless retention is necessary to comply with a legal obligation, in which case the data will be restricted from further processing beyond that obligation.

10. Grievance Redressal and Contact

For any question, complaint, or request relating to this Policy or personal data, including requests to access, correct, update, or erase data, or to withdraw consent, contact:

- **Grievance contact:** Shreyas Devarajan (info@invizn.ai)
- **Response timeline:** acknowledgement within 48 hours

Grievances will be addressed within the timelines prescribed under the DPDP Rules. If unresolved, Data Principals may escalate complaints to the Data Protection Board of India.

11. Rights of Data Principals

- Right to access a summary of personal data being processed and the processing activities undertaken
- Right to correction and updating of inaccurate or incomplete personal data
- Right to erasure of personal data once the purpose for processing is no longer being served
- Right to withdraw consent at any time, as easily as it was given
- Right to nominate another individual to exercise these rights on the Data Principal's behalf in the event of death or incapacity
- Right to grievance redressal, as described in Section 10

These rights may be exercised by writing to the grievance contact above. Identity verification may be required before a request is actioned.

12. Cookies and Tracking Technologies

The Platform does not currently use analytics or advertising cookies or trackers. Only essential cookies required for login sessions and core functionality are used. If analytics or marketing tools are introduced in future, a cookie consent banner and an updated version of this Policy will be published before those tools go live.

13. Children's Data

The Platform is intended for business use by adult vendors, planners, and venue operators, and is not directed at children. Invizn does not knowingly collect personal data of individuals under eighteen years of age. If it

becomes apparent that a child's data has been collected without verifiable parental or guardian consent, that data will be erased promptly.

14. Security Safeguards

Reasonable technical and organisational safeguards are implemented to protect personal data against unauthorised access, disclosure, alteration, or destruction, consistent with Rule 6 of the DPDP Rules, including:

- Encryption of data in transit and, where applicable, at rest
- Access controls and role-based permissions for internal systems
- Logging and monitoring of access to personal data
- AES-128-CBC + HMAC-SHA256, Fernet/AES-128

In the event of a personal data breach, the Data Protection Board and affected Data Principals will be notified in accordance with Rule 7 of the DPDP Rules.

15. Relationship with the Terms and Conditions

This Policy governs how personal data is collected and processed. It is separate from, and should be read together with, Invizn's Terms and Conditions, which govern the commercial relationship with Registered Users, including account usage, ownership of AI-generated outputs, liability, and termination. In the event of a direct conflict between the two documents specifically on the treatment of personal data, this Policy will prevail.

16. Governing Law and Jurisdiction

This Policy is governed by the laws of India, including the DPDP Act and DPDP Rules. Subject to the jurisdiction of the Data Protection Board of India in respect of matters within its statutory remit, any dispute arising out of or relating to this Policy will be subject to the exclusive jurisdiction of the courts at Thane, India.

17. Severability

If any provision of this Policy is found to be invalid or unenforceable under applicable law, that provision will be modified to the minimum extent necessary to make it enforceable, or severed if it cannot be so modified, and the remaining provisions will continue in full force and effect.

18. Updates to This Policy

This Policy may be updated from time to time to reflect changes in practice or legal requirements. Material changes will be notified to Registered Users through the Platform, or by email or WhatsApp, prior to taking effect, and the effective date in the document control block will be revised accordingly. Where a Registered

User's continued use of the Platform is treated as acceptance of an updated Policy, that will be stated clearly at the time of the update rather than assumed.

Annexure A: Registration Consent Notice

This is the consent notice shown at registration. Each item is presented as a separate, individually selectable option, consistent with the DPDP requirement that consent not be bundled into a single blanket acceptance.

Modal heading

"Before you continue: how Invizn will use your information"

Consent items, each with its own checkbox

- I consent to Invizn collecting my name, phone number, email, and business details to create my account.
- I consent to Invizn processing images and content I upload, including sending them to third-party AI tools, to generate styled designs.
- I consent to being contacted via WhatsApp or email for onboarding, support, and service updates.
- I confirm that any personal data of my own clients that I upload to the Platform, such as names or contact numbers, has been collected by me lawfully and with their consent.

Text shown below the checkboxes: "You can withdraw consent at any time from Account Settings, under Privacy, or by contacting info@invizn.ai. Read the full Privacy Policy [\[link\]](#)."