

PRIVACY POLICY | CAPTAIN AGRI MACHINERY EXIM LLP

Effective date: 22-01-2026 | **Last updated:** 22-01-2026

CAPTAIN AGRI MACHINERY EXIM LLP, a limited liability partnership registered under the laws of India bearing LLPIN AAD-3563 having its registered office at Kotda Sangani, Rajkot, Veraval Shapar, Gujarat, India, 360027 (the “**Company**”, “**We**”, “**Us**”, “**Captain**”, “**Our**”) operates <https://captainagri.com/> (hereinafter referred to as the “**Website**”) under the brand name “**Captain**”. We, at Captain, aim to adhere to the ethical standards pertaining to collection, usage and safeguarding of the information provided by You during the use of the Website. We collect only the personal data We need to take and deliver Your orders, handle payments, provide support, run marketing (only with Your consent where required), and improve our Website and Services. “**Service(s)**” would mean, including but not limited to designing, manufacturing and exporting of mini/compact tractors and associated farm implements and also providing sales and after-sales support for these agricultural machinery products.

For the purposes of this Privacy Policy, the term “**User(s)**” and wherever the context so requires “**You**”, “**Your**”, shall mean any natural or legal person who accesses or uses the Website and, in the event, that a natural person is representing a business entity, reference to such terms shall include a reference to such business entity as well.

We have adopted this privacy policy (“**Privacy Policy**”) to inform You of: (i) the information We collect from You through the Website; (ii) the manner of collection and processing of such information; (iii) use of such information; and (iv) the steps We take to protect it. By using the Website, You unconditionally agree to the terms of use of this Privacy Policy and consent to collecting, usage, storage, processing, handling, transferring and sharing of the information submitted by You in accordance with the terms contained hereunder. Please read the Privacy Policy before using the Website and if You do not agree with the terms of use of this Privacy Policy, please do not proceed further to use this Website. Please note that the capitalized terms not defined under this Privacy Policy shall have the same meaning as assigned to such terms in the Terms of Use. The Privacy Policy shall be read in conjunction with the **Privacy Notice** when accessing the Platform or availing any Services provided through the Website. “**Privacy Notice**” means the notice issued by the Company from time to time in accordance with applicable data protection laws, including the DPDP Act, which describes the manner in which personal data is collected, used, disclosed, stored, and otherwise processed through or in connection with the Company’s website, including when users browse the website, submit enquiries, register accounts, access services, or otherwise interact with the website and related online features. The Privacy Notice forms an integral part of this Privacy Policy and shall apply exclusively to personal data processed through the website.

For legal purposes, this Policy is the notice required under the Digital Personal Data Protection Act, 2023 (“**DPDP Act**”).

A. USER INFORMATION

The Website collects certain information and data when You register or, where permitted, make purchases without registration via the Website, subscribe to Our communications, interact with Our customer support, or otherwise transact with us in India. It also covers data processed on Our behalf by third-party service providers (payment processors, delivery partners, analytics providers, marketplaces, etc.). Where relevant, We distinguish between “**Data Principal**” (You) and “**Data Fiduciary**” (Captain) as used in the DPDP Act. There are two types of information being collected: (i) User Information; (ii) automatically collected information (“**Auto-Collected Info**”) during the usage of the Service(s).

1) User Information and Access

(a) We collect Your Information when You successfully submit information while creating Your account and/or while availing Our Services on Our Website. While doing so, We may collect data that can be used to uniquely identify or contact a person and/or the business entity that a person represents and shall include, but not be limited to, information regarding Your name, name of the business entity that You represent, address and telephone number of the business entity, Your e-mail

address, information associated to Your social networking platform and such other information for the purposes of identification and verification. We may also ask You to share the OTP sent via SMS or a password or to verify a link sent on Your e-mail address. While You are using Our Website, We record Your responses and activity data, including but not limited to, textual and voice responses and session details. We do not directly process any payments and do not store Your debit/credit card information. Secured socket layer technology is used for processing payment transactions with third party service provider partners. When You submit User Information on the Website, it shall be deemed that You have granted Us the right to collect, store, process, handle and use such User Information, in accordance with this Privacy Policy (as amended from time to time). Further, You agree and consent to receive all communications related to Our Services on the mobile number provided by you to the Company, even if such mobile number is registered under DND/NCPR list under the Telecom Commercial Communications Customer Preference Regulations, 2018 ("**TRAI Regulations**").

(b) We may ask for permission to access Your data storage. However, the data storage access shall be limited to the access to store the data downloaded or saved during the usage of the Website or the products directly in the User's device for ensuring easy storage and access to the User. We shall not utilize this permission to access any other data on the User's device, except as expressly mentioned in this Privacy Policy.

(c) The said information collected from the Users could be categorized as "**Personal Information**", "**Sensitive Personal Information**" or other information and would be governed in accordance with the DPDP Act, together with any rules, notifications, or directions issued thereunder. To the extent applicable, Information Technology Act, 2000, Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 (the "**IT Rules**"), Consumer Protection (E-Commerce) Rules, 2020 or Information Technology (Intermediary Guidelines & Digital Media Ethics Code) Rules, 2021 and other relevant applicable laws of the jurisdiction may also apply. For the purposes of this Policy, all such information will collectively be referred to as "**User Information**" in this Policy.

(d) We may use the User Information to contact You from time to time, to provide You with the Services We offer through the Website, important information and circulate marketing and promotional material in relation thereto. We may ask You for more information for identification purposes, if required. The User shall be permitted to access the Website via any device provided that the log in/access credentials match with the User credentials.

(e) You may visit the Website and browse the Website without having to provide User Information. We will, at all times, provide the option to You to not provide the Personal Information or Sensitive Personal Information, which We seek from You. Where possible, We indicate which fields are mandatory and which fields are optional to be filled on the Website. You always have the option to not provide information by choosing not to submit particular information or feature on the Website. In such event, however, certain functionalities or features provided by the Company may not be accessible or will be limited.

(f) By using this Website, You consent to the collection, storage, use and transfer of the User Information that You provide in connection with any of the Services that We offer through Our Website, and You consent to Our collection of any changes or updates that you may provide to the User Information. We collect only such User Information that We believe to be relevant for the purpose of identification and verification and is required to understand You or Your interests. It is clarified that We shall not be liable, for any reason whatsoever, for the authenticity of any User Information provided by You to Us. You hereby confirm that the User Information provided by You is and shall continue to be valid, true and accurate to the best of Your knowledge.

(g) We may also collect information regarding Your location. This information will not be sold to, or shared with, any unaffiliated third party.

(h) If any portion of the User Information relates to a minor (i.e., an individual under the age of 18 years) or to a person of unsound mind, You shall ensure that such information is shared only with the verifiable consent of the parent or lawful guardian, as required under the DPDP Act. By providing

such information, You represent and warrant that verifiable consent has been obtained from the parent or lawful guardian.

(i) Your personal data may be stored or processed on servers located outside India (for example, by Our cloud hosting or analytics partners). In such cases, We ensure that transfers are made in compliance with applicable laws, including the DPDP Act.

2) Categories of data We collect and how We collect it

(a) Data You provide directly:

- (i) Account registration: name, date of birth, email address, password (securely stored), phone number;
- (ii) Checkout & orders: delivery address, billing address, Banking & Tax Registration Numbers (if provided), preferred delivery instructions;
- (iii) Payments: We do not collect full card details on Our servers. we may store payment tokens or transaction IDs returned by PSP;
- (iv) Customer support: chat transcripts, emails, call recordings (where consented/stated);
- (v) Marketing preferences and opt-ins (email / SMS / WhatsApp opt-ins);
- (vi) Reviews & feedback: any content You post publicly (product review, photos).

(b) Data collected automatically

- (i) Technical data: IP address, browser type and version, device type, operating system, device identifiers, crash logs, and language settings.
- (ii) Usage data: pages visited, timestamps, referral URLs, session duration, items viewed, cart behaviour.
- (iii) Cookies & tracking identifiers (see Section C). these power targeted advertising (retargeting) on platforms such as search engines and social media.
This type of information does not identify You personally during Your visit to the Website. We can identify You only after You submit User Information at the time of registering Yourself with the Website.

(c) Data from third parties

- (i) Marketplace orders: if You purchase via third-party marketplaces, the marketplace may share order/delivery data with us;
- (ii) Social login or advertising networks: if You use social login or click on ads, partners may share identifiers or profile data.

(d) Data from Social Media Handles

Since Captain maintains its social media presence on platforms like Instagram, LinkedIn, Facebook and YouTube (hereinafter referred to as “**Social Media Handles**”), We collect and process limited information made available through user interactions on these platforms. Such information may include:

- (i) Publicly available profile information (such as name, username, profile photo, and any other details shared publicly by the user);
- (ii) Comments, messages, reviews, or other communications made on Captain's social media pages;
- (iii) Engagement data such as likes, shares, follows, reactions, and other activity metrics;
- (iv) Demographic insights and analytics provided by the social media platforms (e.g., age range, gender, location, and interests) in an aggregated and anonymized form; and
- (v) Any information voluntarily shared by Users through direct messages, forms, or participation in campaigns, surveys, or contests hosted on these platforms.

Any information or data relating to third parties that is collected through third party service providers such as Facebook shall continue to be governed by the applicable terms of use of such third party or the relevant platform, as the case may be, until such information or data is accessed, received, or transferred to Captain's Website.

B. COLLECTION OF INFORMATION

1) Purposes for which We use personal data (what We do with it)

We use personal data for the following purposes:

(a) **Order fulfilment & customer service** — to process Your order, confirm stock, arrange manufacture / packaging, arrange shipment, share delivery details with logistics partners, and respond to returns, refunds, cancellations and queries. (Necessary for contract performance.)

(b) **Payment processing & fraud prevention** — to complete payments, process refunds, reconcile transactions, and detect and prevent fraud. (Processed via PSPs; We may share transaction details with banks/PSPs.)

(c) **Manufacturing & fulfilment coordination** — to share order specifications with third-party manufacturers or packers (e.g., for bespoke/customised orders or drop-ship fulfilment) where necessary to produce or ship the product. We share only the minimum data necessary for fulfilment (typically product, quantity, delivery name & address, phone).

(d) **Customer support & dispute resolution** — to operate call/chat support and to keep records of interactions (chat logs, call recordings where local law requires notice/consent).

(e) **Marketing & advertising (with consent where required)** — to provide personalized recommendations and maintain general and personalized content, to send transactional messages (order confirmations, delivery updates) and, if You opt in, promotional emails/SMS/WhatsApp and personalised ads using permitted identifiers and advertising platforms. WhatsApp promotional or template messages follow WhatsApp Business guidelines (templates and opt-in requirements) and We keep records of opt-ins and SMS follows TRAI guidelines, as required.

(f) **Analytics & improvement** — to analyse Website usage, run A/B tests, and improve product assortment and the shopping experience (via analytics providers and aggregated, anonymized metrics).

(g) **Legal compliance & safety** — to comply with tax, audit and other statutory obligations (e.g., retention for accounting), to respond to lawful requests from authorities, and to protect Our rights and customers against abuse/fraud.

(h) **Legitimate business purposes** — to manage Our business, including accounting, risk management, and potential sale or restructuring (in such event We may transfer data consistent with this Policy and applicable law).

2) The User Information is being collected by the Company and the Company will delete any User Information upon the User withdrawing the consent in writing, however, upon the withdrawal of the consent by the User, the Company may, at its option, not provide any Services for which the User Information was sought and the User shall not claim deficiency of Services on the basis of such non provision of goods and Services.

3) To enhance Your use of the Website, certain information may be collected each time You visit the Website which are saved in server logs. It is clarified that these statistics help Us in improving the efficiency of the Website by giving Us information relating to Your use of the Website. Such information may include details of the server from where the Website is being accessed, the browser and operating system used to browse the Website, details of Your last visit to the Website, including time, date and the duration of Your session on the Website. This information is used by us to understand the number of users visiting the Website and gather broad demographic information for aggregate use of the Website. While collecting such information, Your anonymity shall be maintained at all times and at no time can We identify You personally, unless You submit the Information on the Website or through the e-mail feature.

4) You acknowledge that apart from Your User Information, if You upload or exchange any data, content, information, pictorial representations and/or images including post any comments on the Website (collectively referred to as the “**Content**”), such Content may contain information including User Information and the same may be available to the other Users of the Website. We will not be liable for the disclosure and dissemination of such User Information on the Website.

C. COOKIES

Like most other platforms, We use data collection technologies such as cookies, local storage, pixels, data collection devices and similar tools to collect and store information about Users of the Website.

1) A cookie is a small text file sent to Your browser from a web server or mobile application and stored on Your device. Cookies and similar tools are a reliable mechanism to remember Your activities and preferences (such as items in Your cart, login state, or language settings), and they help improve Your shopping and browsing experience.

2) We use these technologies for purposes including:

- (i) Operating the Website and enabling core features (e.g., checkout, saved carts).
- (ii) Remembering Your preferences and enhancing User experience.
- (iii) Measuring and improving Website performance, running A/B tests, and analyzing traffic.
- (iv) Securing transactions and preventing fraud.
- (v) Delivering interest-based advertising and marketing campaigns, including retargeting across Google, Meta, and other third-party platforms.

The data collected through cookies may be anonymous or pseudonymized, and We maintain such data distinctly from User Information that You submit directly to Us.

3) You can manage or disable cookies through (i) Our cookie consent banner, and/or (ii) Your browser or device settings. However, please note that certain features of the Website (such as personalized recommendations, cart functionality, or forms) may not be accessible or may function less effectively if You refuse or delete cookies. We do not control the use of cookies by third parties and shall not be liable for any reason whatsoever for these third party cookies.

4) You may encounter cookies, pixels, or similar technologies placed by third parties on certain pages of the Website (for example, advertising partners or analytics providers). We do not control the use of such cookies and disclaim liability for any data practices of these third parties.

D. DISCLOSURE OF USER INFORMATION

1) The User Information may be disclosed to affiliate companies within Our corporate family, with third parties with which We have partnered to allow Us to integrate their services into Our Own Services, and with trusted third-party service providers as necessary for them to perform services such as:

- (a) Processing credit card payments;
- (b) Serving advertisements;
- (c) Conducting contests or surveys;
- (d) Performing analysis of Our Services and customers demographics;
- (e) Communicating with You, such as by way email or survey delivery;
- (f) Customer relationship management;
- (g) Security, risk management and compliance;
- (h) Recruiting support and related services.

In view of the same, You may be subject to the practices of such third parties as well.

2) Except as provided under this Privacy Policy, We shall disclose the User Information only under the circumstances where the User has provided express instructions or consent towards such disclosure.

3) All third parties are contractually bound to process data only for the purposes We authorized and to keep it secure.

E. SECURITY PRECAUTIONS

1) To prevent any form of unlawful interception or misuse of User Information, We use reasonable physical, electronic, and managerial procedures to safeguard and secure the User Information collected. We use reasonably secure and technologically appropriate measures, in compliance with the relevant applicable laws of the jurisdiction to protect You against loss or misuse of Your User Information including internal reviews of data collection, storage and processing practices and other reasonable security measures which are equivalent to security measures that We use to protect Our own confidential information. We have in place a secure server for all Your transactions on the Website, which, if required to be accessed, are accessible only by Our authorized personnel.

However, as You are aware, no internet site/mobile based application is completely free of security risks and We do not make any representation in respect of the same.

2) We do not warrant that Our Website or any electronic communication made by Us is free from virus or other harmful effects. In the event of any errors in transmission or in the event of Our Website being inaccessible due to an act of any third party or due to any outage, or any technical or technological failure, or similar reasons beyond Our control, We shall not be held liable or responsible for any losses/ damages incurred by You, and You agree that you will not have any claims against us regarding the same. You explicitly agree that Your use of the Website and/or Services is at Your own individual risk. You agree and confirm that Your User Information may be collected, used, transferred, processed and stored in the manner stipulated in this Privacy Policy. You hereby confirm that You have been made aware of the security measures undertaken by Us and You expressly consent to Us collecting, storing, handling, processing and using Your User Information.

3) While no system is completely secure, We implement reasonable security practices and industry-standard safeguards (such as, Secure Socket Layer (SSL) technology) in order to transmit all supplied sensitive information and then encrypt into Our Payment gateway providers database only to be accessible by those authorized with special access rights to such systems and are required to keep the information confidential. After a transaction, Your private information (credit cards, social security numbers, financials, etc.) will not be stored on Our servers. While We have mechanisms in place to safeguard Your personal information after We receive it, no transmission of data over the internet can be fully secure and We make no representation in respect of the same.

F. RETENTION OF PERSONAL DATA

1) We retain personal data only as long as necessary for the purpose for which it was collected and to meet Our legal and regulatory obligations. Typical retention examples:

(a) Order & transactional records: retained for tax/accounting and warranty/return purposes (commonly up to 7 years where needed).

(b) Account profile & preferences: retained until You delete Your account or withdraw consent (subject to legal requirements).

(c) Marketing consents & records: retained as required to demonstrate consent under applicable laws and to honour opt-out requests.

2) If You request erasure and We have no lawful ground to retain certain records (e.g., for tax or regulatory reasons), We will delete or anonymize the data as required by law and this Policy.

G. YOUR RIGHTS UNDER THE DPDP ACT (HOW TO EXERCISE THEM)

1) Under the DPDP Act You have the right to:

(a) **Access** Your personal data that We hold and to obtain copies.

(b) **Correction / completion / updating** of inaccurate or incomplete data.

(c) **Erasure** (the “right to be forgotten”) subject to legal or contractual retention obligations.

(d) **Data portability** where technically feasible (receive data in a commonly used, interoperable format).

(e) **Grievance redressal**, access to an internal grievance mechanism and escalation channels required by law.

To exercise any of the above rights, mail Our Privacy/Data Protection team at branddevelopment@captainagri.com or the Grievance Officer at dms@captainagri.com. We may require identity verification before fulfilling requests. We will respond within the timeframes required by law or, where the law is yet to prescribe, as soon as reasonably practicable.

H. CHILDREN'S PRIVACY

1) Our Services are intended for farmers, agricultural enterprises, and authorized dealers or distributors engaged in the purchase, use, or resale of agricultural machinery and related equipment. The Website and associated Services are not directed to, and are not intended to be used by, children under the age of eighteen (18) years.

2) We do not knowingly collect personal data directly from children. Any personal data relating to a child (for example, delivery details including the child's name) must be provided only by a parent or legal guardian. By submitting such information, You represent and warrant that You are the parent or lawful guardian of the child, or that You have obtained the necessary verifiable consent from such parent or guardian, as required under the Digital Personal Data Protection Act, 2023.

3) If We become aware that We have inadvertently collected personal data directly from a child without appropriate consent, We will take steps to delete such data promptly and, where required by law, notify the child's parent or guardian.

4) If You believe We may have collected personal data of a child in violation of this Policy, please mail Us immediately at branddevelopment@captainagri.com.

I. LINKS, THIRD-PARTY SITES & EMBEDDED SERVICES

The Website may provide third party information and links to other platforms that are not affiliates of or operated or controlled by Us including but not limited to payment gateways or social networking platforms. We are not responsible for any form of transmission, whatsoever, received by You from any third-party platform and accordingly do not make any representations concerning the privacy practices or other policies of such third-party Websites. Under no circumstances shall We be deemed to control or guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, cookies, messages or other materials available on such platforms. Any User Information provided by You to such third-party Websites shall be governed in accordance with the privacy policies of such platforms and it is recommended that You review the privacy policy of such platforms prior to using such platforms.

J. CHANGES TO THIS PRIVACY POLICY

We reserve the right to update, modify and amend any of the terms of Our Privacy Policy, at any time without prior intimation to You. We will post these changes on Our Website for Your information.

These changes will become effective immediately on posting. We will, however, provide a reasonable window for users to review the revised Privacy Policy before the updated terms are implemented. We shall not be liable for any failure or negligence on Your part to review the updated Privacy Policy before accessing or availing the Website for availing the Services. Your continued use of the Website, following changes to the Privacy Policy, will constitute Your acceptance of those changes.

K. DISCLOSURES REQUIRED BY LAW

We reserve the right to disclose User Information when required by any applicable law. We will disclose such User Information wherein We have a good-faith belief that it is necessary to comply with a court order, ongoing judicial proceeding, or other legal process served on Us from any jurisdiction as may have been applicable to Us by virtue of the location of the User of the Services or to exercise Our legal rights or defend against legal claims.

L. CONTACTING THE WEBSITE

If You have any questions or grievances regarding (i) this Privacy Policy; (ii) practices of this Website, or (iii) Your dealings with this Website or believe that We have not adhered to it, You can contact the officer of the Company at coordinates mentioned below:

Name: Ravi Dolashiya

Email: branddevelopment@captainagri.com

Address: Padvala Main Road, Veraval (Shapar) Tal : Kotda Sangani, Dist. Rajkot, 360024 Gujarat India.

The Grievance Officer is identified above pursuant to the provisions of applicable laws including but not limited to IT Rules and the DPDP Act and the Rules enacted under those laws.

This Privacy Policy shall be read in conjunction with the Website's Terms of Use and all the relevant provisions of the Website's Terms of Use (including but not limited to indemnification, limitation of liability and governing law) shall mutatis mutandis apply to this Privacy Policy and be deemed to be incorporated herein by reference.