
OMNIRA ONE PRIVATE LIMITED

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POLICY DOCUMENT

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Policy 5: Privacy Policy

Document Type: Data Protection & Privacy Policy
Effective From: 01/09/2025
Approved By: Board of Directors, Omnira One Pvt. Ltd.

1. Introduction

Omnira One Pvt. Ltd. (“we”, “us”, or “our”) respects your privacy and is committed to protecting the personal information of users, distributors, and customers. This Privacy Policy explains how we collect, use, store, disclose, and safeguard your personal data when you visit our website, mobile applications, or interact with our services.

This policy applies to:

- Visitors of www.omniraone.com
 - Registered Distributors and Customers
 - Mobile App Users
 - Partners, Service Providers, and Associates
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2. What Personal Data We Collect

We may collect the following categories of personal and sensitive personal data:

Type of Information	Examples
Identification Data	Full name, PAN, Aadhaar, Passport, Gender, Date of Birth
Contact Information	Email, Mobile Number, Address
Distributor Data	Bank Account Details, KYC Documents, Nominee Info
Login Credentials	Password (encrypted), IP Address, Device ID
Transactional Data	Product Orders, Bonus History, Payouts, Refunds
Educational/Training	LMS usage, course completions, certifications
Marketing Preferences	Consents for WhatsApp/SMS/email promotions

3. How We Use Your Data

We use the collected data for the following lawful purposes:

- To process registration, onboarding, and account verification
- To fulfill orders and deliver products or services
- To calculate commissions and execute payouts
- To issue invoices, credit notes, and tax-related documentation
- To conduct compliance audits and legal verification
- To improve website functionality, customer support, and services
- To run training and certification programs via our LMS
- To send important notifications, updates, and promotional offers (with consent)

4. Legal Basis of Processing

We process personal data on the basis of:

- Consent obtained at registration
- Legal obligations (under MCA, Income Tax, Consumer Protection, etc.)
- Contractual necessity (Distributor Agreement)
- Legitimate business interest (performance, fraud prevention, etc.)

5. Sharing of Information

We **never sell** your personal information. Data may be shared only with:

- Government authorities (e.g. Income Tax, MCA, Consumer Ministry)
- Banks and payment processors (for payouts or refunds)
- Certified legal, audit, or accounting professionals
- Platform vendors (e.g., KYC API providers, LMS vendors)
- Delivery/logistics partners (address & contact info only)
- With explicit user consent for co-branded campaigns

All such third parties are contractually bound to maintain confidentiality and follow lawful data handling practices.

6. Data Storage & Security

- All personal data is stored on secure, encrypted cloud servers located in India.
- We follow **ISO 27001**, **OWASP**, and **industry-leading encryption standards**.
- Only authorized personnel may access sensitive data under strict access controls.

7. Data Retention

- Personal data is retained for **as long as required** by law (e.g., 7 years for financial data).
- If you cancel your ID, we retain your records for internal/statutory purposes unless deletion is requested (and permissible).

8. Your Rights

As a user or distributor, you have the right to:

- ✓ Access your personal data
- ✓ Correct or update your information
- ✓ Withdraw marketing consent at any time
- ✓ Request account/data deletion (subject to compliance & payout completion)
- ✓ File a grievance via our **Grievance Redressal Policy**

To exercise these rights, please email privacy@omniraone.com

9. Cookies & Tracking

We use cookies to:

- Improve user experience
- Track session preferences
- Analyze website performance

You can disable cookies via browser settings. Certain features may be impacted.

10. Children's Privacy

Our services are not intended for individuals **under the age of 18**. We do not knowingly collect data from minors without parental consent.

11. Updates to Policy

This Privacy Policy may be updated from time to time. The latest version will always be available at www.omniraone.com/privacy-policy. We recommend checking periodically.

12. Contact Us

If you have any questions or concerns about this policy:

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|--|--|
|  Email | privacy@omniraone.com |
|  Web Portal | www.omniraone.com/grievance |
|  Postal | Omnira One Pvt. Ltd., Office No 312, Kuber Complex, Opp Laxmi Industrial Estate, Link Road, Andheri (West), Mumbai - 400053, Maharashtra, India. |
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Declaration

“Omnira One is fully committed to data protection and consumer privacy. We comply with all relevant Indian data protection laws and global privacy principles.”

End of Document

Version: 1.0

Date of Issue: 01/09/2025

Approved By: Chief Compliance Officer, Omnira One Pvt. Ltd.