LACSPACE CORPORATION PVT. LTD.

Legal Centre · Controlled legal document

Privacy Policy

How Lacspace collects, uses, secures, and retains personal data across its websites, apps, AI features, and services — and the rights you have over your data.

Version v2.2 · Effective 13 November 2026 · Updated 1 November 2026 · 44 sections · 81 clauses

Document ref. LAC-LEGAL-PRIVACY-POLICY-V2.2

Published by Lacspace Corporation Pvt. Ltd. — registered in India (CIN U46511DL2025PTC079972) and Nepal (Reg. No. 377566/82/83).

AT A GLANCE

A plain-language summary — the full text below is what legally applies.

- Lacspace collects only the data it needs to run, secure, and improve its websites, apps, AI features, and services — and it does not sell your personal information.
- Its platforms are multi-tenant, so your data is structurally isolated from other customers'; where a business (like a hospital or school) uses a platform, that organisation is the controller and Lacspace acts as processor.
- You can access, correct, delete, port your data, and withdraw consent, with regional rights supported under GDPR, India's DPDP Act, and US state privacy laws.
- Reach the privacy team and Grievance Officer at privacy@lacspace.com; report security issues to security@lacspace.com.

1. Introduction & Scope

1.1 Lacspace Corporation Pvt. Ltd. and its affiliates ("Lacspace," "we," "us," or "our") respect your privacy. This Privacy Policy explains how we collect, use, disclose, secure, and retain personal data when you use our websites, mobile and web applications, AI features, APIs, and services (the "Services"), and the rights you have over your data.

1.2 This Policy works alongside our Terms of Use , Cookie Policy , and License & Code of Conduct.

2. Who We Are & Our Role

2.1 Lacspace is a global, country-neutral technology company with a remote-first team and customers worldwide. For legal purposes we are registered in India (CIN U46511DL2025PTC079972, RoC-Delhi) and Nepal (Reg. No. 377566/82/83, PAN 622468837).

- When we decide why and how personal data is processed (for example, our marketing site or account sign-up), we act as a **data controller** .
- When we process data on behalf of a business customer using our platforms, we act as a **data processor** , and that customer is the controller.

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3. Definitions

- **Personal data** — information that identifies or can identify an individual.
- **Processing** — any operation performed on personal data (collection, use, storage, disclosure, deletion).
- **Controller** — the party that determines the purposes and means of processing.
- **Processor / Sub-processor** — a party that processes data on a controller's behalf.
- **Special-category data** — sensitive data such as health data, given heightened protection.

4. What This Policy Covers

4.1 This Policy covers personal data processed by Lacspace across its ecosystem of products — including CareSewa, Lekhio, CorperaHQ, and our other software, apps, and AI-powered services (see the full list on our products page). Certain products may provide additional, product-specific privacy notices, which supplement this Policy for those products.

5. Multi-Tenant & Provider Data

5.1 Many Lacspace platforms are multi-tenant: business customers (for example, a hospital, school, or company) operate isolated tenants and act as controllers of the data within them. Where you interact with a Service through such an organisation, that organisation's privacy notice governs its use of your data, and this Policy explains our role as the processor providing the technology.

6. Information You Provide

- **Account & profile** — name, email, phone, organisation, role, and credentials.
- **Billing** — billing name, address, tax details, and transaction records (card data is handled by our payment processors).
- **Content** — data and files you submit to or create within the Services.
- **Communications** — messages you send us for support, sales, or feedback.

7. Information Collected Automatically

- **Device & usage** — IP address, device and browser type, operating system, pages viewed, and interactions.
- **Log & diagnostics** — timestamps, error reports, and performance data.
- **Cookies & similar** — as described in our Cookie Policy .
- **Approximate location** — derived from IP address for security and localisation.

8. Information from Third Parties

8.1 We may receive data from third parties you connect (for example, single sign-on, payment, or messaging providers), from business customers who invite you to their tenant, and from partners or public sources for fraud-prevention and analytics. We combine this only as needed to provide and secure the Services.

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9. Sensitive & Special-Category Data

9.1 Some Services (notably healthcare products) may process sensitive data, such as health information, on behalf of a provider. We process such data only under appropriate legal bases and safeguards, apply heightened protection, and never sell it. Where you are a patient, your provider controls this data, and CareSewa's consent model puts sharing decisions in your hands.

10. Children's Data

10.1 Our Services are not directed to children under 16 (or the age set by local law) except where a Service is provided to a school or institution under appropriate consent and supervision. We do not knowingly collect children's data outside such contexts and will delete it promptly if collected inadvertently. Parents, guardians, or institutions may contact us to review or remove a minor's data.

11. Purposes of Processing

- Provide, operate, maintain, and secure the Services.
- Authenticate users and prevent fraud, abuse, and security incidents.
- Process payments, manage subscriptions, and provide support.
- Personalise experiences and improve features and performance.
- Communicate service, security, and (with consent) marketing messages.
- Comply with legal obligations and enforce our terms.

12. Legal Bases for Processing

12.1 Where required by law, we rely on one or more of the following legal bases:

- **Contract** — to provide the Services you request.
- **Consent** — for marketing, certain cookies, and sensitive data, which you may withdraw at any time.
- **Legitimate interests** — to secure, improve, and promote our Services, balanced against your rights.
- **Legal obligation** — to comply with applicable laws and lawful requests.
- **Vital interests** — in rare cases, to protect someone's life or safety.

13. AI & Automated Processing

13.1 Some Services use AI to power features like search, suggestions, and automation. We do not use your confidential Customer Data to train shared foundation models except as permitted by your plan and consent. We do not make solely automated decisions that produce legal or similarly significant effects about you without a lawful basis and, where required, human review.

14. Marketing & Communications

14.1 With your consent where required, we may send newsletters, product updates, and offers. Every marketing message includes an unsubscribe option, and you can adjust preferences at any time. We do not sell your personal data, and we honour opt-outs promptly. Essential service and security messages are not marketing and continue while you use the Services.

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15. Personalisation & Analytics

15.1 We use analytics to understand how the Services are used, to improve features, and to personalise content. Where required, analytics and advertising cookies are used only with your consent, which you can manage via our Cookie Policy .

16. How We Share Information

16.1 We share personal data only as described in this Policy: with service providers and sub-processors, with your organisation where you use a tenant, with parties you direct us to, in connection with a business transfer, or where legally required. **We do not sell your personal data.**

17. Service Providers & Sub-processors

17.1 We engage trusted providers to operate the Services under contractual confidentiality and data-protection obligations, including for:

- cloud hosting, storage, and content delivery;
- payment processing and billing;
- communications (email, SMS, push) and support tooling;
- analytics, security, and fraud prevention.

17.2 Sub-processors may only process data on our instructions and to provide their service to us.

18. Business Transfers

18.1 If Lacspace is involved in a merger, acquisition, financing, reorganisation, or sale of assets — including our evolving corporate structure and future international entities — personal data may be transferred as part of that transaction, subject to this Policy or a policy with equivalent protections. We will notify you of any material change in who controls your data.

19. Legal Disclosures & Safety

19.1 We may disclose personal data where we reasonably believe it is required to comply with law, respond to lawful requests and legal process, enforce our terms, or protect the rights, property, safety, or security of Lacspace, our users, or the public. Where lawful and appropriate, we will seek to narrow such requests and notify affected customers.

20. International Data Transfers & Safeguards

20.1 As a global company, we may process and store data in India, Nepal, and other countries where we or our providers operate. Where we transfer personal data across borders, we use appropriate safeguards required by law — such as Standard Contractual Clauses or equivalent mechanisms — to protect your data consistently, regardless of where it is processed.

21. Data Residency & Localisation

21.1 Our platforms are multi-country by design and, where a Service or law requires it, we support data-residency and localisation obligations for particular regions. Contact us if your organisation has specific

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residency requirements for an enterprise deployment.

22. Your Privacy Rights

22.1 Subject to applicable law, you may have the right to:

- **Access** the personal data we hold about you.
- **Rectify** inaccurate or incomplete data.
- **Erase** your data ("right to be forgotten"), subject to legal retention.
- **Restrict or object** to certain processing, including profiling and direct marketing.
- **Port** your data to another provider in a structured, machine-readable format.
- **Withdraw consent** at any time, without affecting prior lawful processing.

23. How to Exercise Your Rights

23.1 To exercise your rights, email privacy@lacspace.com or use in-product privacy controls where available. We will verify your identity and respond within the timeframe required by law. If your data is controlled by a business customer (your tenant), we will refer your request to that controller and support them in responding. There is no charge for reasonable requests.

24. Regional Rights — EEA & UK (GDPR)

24.1 If you are in the European Economic Area or the United Kingdom, you have the rights above under the GDPR/UK GDPR, and the right to lodge a complaint with your local supervisory authority. Our legal bases are set out above, and international transfers are safeguarded as described in this Policy.

25. Regional Rights — India (DPDP Act)

25.1 If you are in India, you have rights under the Digital Personal Data Protection Act, including access, correction, erasure, grievance redressal, and nomination. You may raise grievances with our Grievance Officer before approaching the Data Protection Board of India.

26. Regional Rights — California & US States

26.1 If you are a resident of California or another US state with privacy legislation, you may have rights to know, access, delete, correct, and opt out of the "sale" or "sharing" of personal information. **We do not sell your personal information.** We will not discriminate against you for exercising your rights. Submit requests to privacy@lacspace.com .

27. Do Not Track & Opt-Outs

27.1 Some browsers offer "Do Not Track" or global privacy-control signals. Where legally required, we honour recognised opt-out signals for advertising cookies. You can also opt out of marketing at any time via the unsubscribe link in our emails or your account settings.

28. Managing Cookies & Preferences

28.1 You can manage cookies through your browser settings and, where offered, our consent tool. Essential cookies required to run the Services cannot be disabled. See our Cookie Policy for details.

29. How We Protect Your Data

29.1 We apply industry-standard technical and organisational measures, including encryption in transit, access controls, least-privilege permissions, and append-only audit logging. No system is completely secure, but we work continuously to protect your data and to limit access to those who need it to operate the Services.

30. Tenant Isolation & Access Controls

30.1 Our platforms are multi-tenant with structural isolation: every record carries a tenant and every query filters by it, so one customer's data is not accessible to another. Role-based access controls, consent gates, and audit trails keep access accountable and limited.

31. Data Retention

31.1 We retain personal data only as long as necessary for the purposes described, to provide the Services, and to meet legal, accounting, or reporting obligations. Retention periods vary by data type and context. Regulated data (for example, clinical records) may be retained or soft-deleted as required by law. When no longer needed, data is deleted or anonymised.

32. Data Breach Notification

32.1 If a personal-data breach is likely to affect you, we will notify affected users and relevant authorities as required by applicable law and within the required timeframes, and take prompt corrective and remedial measures. Report suspected incidents to security@lacspace.com .

33. Your Security Responsibilities

33.1 You play a key role in protecting your data: keep your credentials confidential, enable available security features, manage your team's permissions, and notify us promptly of any suspected unauthorised access. We are not responsible for loss arising from your failure to secure your account.

34. Healthcare & CareSewa

34.1 For healthcare services, the connected provider (hospital, clinic, lab, or pharmacy) is the controller of patient data; Lacspace provides the technology as a processor. CareSewa is built so that patients hold a Health ID and control sharing through explicit consent — connect, share, revoke — with tenant isolation and audit logging protecting every record.

35. Education Services

35.1 For education products, the school or institution is typically the controller of student and staff data, and we process it on their instructions. We support institutions in meeting their obligations regarding minors' data and do not use student data for advertising.

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36. Payments & Financial Data

36.1 Payment details are processed by trusted, compliant third-party payment gateways. Lacspace does not store full card numbers on its servers. We retain transaction records as needed for billing, tax, and legal purposes.

37. Marketplace & Delivery Services

37.1 For marketplace or delivery services, we share the data necessary to fulfil your order (for example, delivery details) with the relevant merchant or delivery partner. Those parties handle that data under their own privacy practices for fulfilment purposes.

38. Community & User Content

38.1 If you post in public community areas, that content and your chosen display name may be visible to others. Do not share sensitive personal information publicly. You can edit or remove your content where the Service allows, subject to caching and backups.

39. Game Collection App

39.1 To improve the Game Collection app, it sends usage data to our own servers: a random install id, app version, device model, OS version, language and time zone, and what you do in the app: sessions and their length, which games you open and for how long, how rounds end and scores, achievements, missions, notification taps and some settings. If you are signed in, this is linked to your account.

39.2 We work out your country from your network address and do not store the address. We collect no advertising ids, contacts, photos or precise location, and use no third-party analytics SDKs. You can turn usage analytics off at any time in the app under Settings ? Privacy ? Usage analytics; when it is off, nothing more is recorded or sent.

39.3 Retention: usage events are deleted after 90 days and per-device usage totals 13 months after last use. Daily totals that are not linked to anyone are kept.

40. Third-Party Links

40.1 The Services may link to third-party sites and content we do not control. This Policy does not apply to those third parties; please review their privacy notices before providing data to them.

41. Changes to This Policy

41.1 We may update this Policy to reflect changes in our practices, technology, or the law. Material changes will be communicated by reasonable means (for example, email or a website notice), and the "Effective" date above will be updated. Continued use after the effective date constitutes acceptance.

42. Data Protection & Grievance Officer

42.1 You can reach our privacy team and Grievance Officer at privacy@lacspace.com or grievance@lacspace.com . We acknowledge and address privacy grievances within the timeframes required by applicable law.

43. Complaints & Supervisory Authorities

43.1 We would like the chance to resolve your concerns directly, so please contact us first. You also have the right to complain to your local data-protection or supervisory authority — for example, an EU/EEA/UK authority, or the Data Protection Board of India — if you believe your rights have been infringed.

44. How to Reach Us

44.1 For privacy questions or to exercise your rights, contact privacy@lacspace.com , or visit our contact page . For security reports, use security@lacspace.com .

44.2 Lacspace Corporation Pvt. Ltd. — a global, country-neutral technology company. Registered in India and Nepal; customers worldwide.

DOCUMENT CONTROL

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