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GRAINE TRUST CENTER · DOCUMENT

Your Data Rights: how to make a request

GR-PUB-02 · Version 1.3

Approved — effective 3 November 2026

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GR-PUB-02	1.3	Public

GRAINE AI · MAVRIX AI PRIVATE LIMITED

Document control

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STATUS	Approved
OWNER	Privacy & Grievance Officer (Rishabh Bhanot)
APPROVED BY	Rishabh Bhanot, Founder (top management), 3 Nov 2026
EFFECTIVE DATE	3 Nov 2026
LAST UPDATED	4 Nov 2026
NEXT REVIEW	By 3 Nov 2027 (12 months after approval), or on a significant change
CLASSIFICATION	Public
APPLIES TO	Anyone who wants to use a right over personal data held by Graine, or held for a business that uses Graine

This page tells you how to ask Graine to show, correct, complete or erase your personal data, how to nominate someone to act for you, and how to withdraw a consent. It is the published means required by Rule 14(1) of the Digital Personal Data Protection Rules, 2025 (the "Rules"), read with sections 11 to 14 of the Digital Personal Data Protection Act, 2023 (the "Act"). The Rules' duties on rights start on **13 May 2027**; we follow this process now.

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1. In short

1. Email **founders@graine.ai** with the subject "Data request". Say what you want and give an identifier (part 4).
2. You get a reference number. We confirm who you are, find your data, and answer within **30 days** and never later than **90 days**.
3. If a business contacted you using Graine, that business decides what happens to your data. We pass your request to it and help it answer.
4. If you are not satisfied, use our grievance process, and then the Data Protection Board of India.

2. Which request goes to whom

YOU ARE…	WHO DECIDES	WHAT TO DO
A person with a Graine account, a member of a workspace, a payer, a visitor, or someone who has written to us	**Graine** (Data Fiduciary)	Write to us as in part 4
A person a business called, messaged on WhatsApp, or talked with in its app or website, using a Graine agent	**The business** (Data Fiduciary); Graine processes for it (Data Processor)	Ask the business first. If you write to us, we pass your request to it within 3 working days and help it reply. We do not answer for it. Tell us the business name, the phone number it used, and roughly when
A person in the European Union or the United Kingdom	As above	The rights in part 3 apply to you as well. Write to us the same way

3. Your rights

RIGHT	WHAT IT MEANS	WHERE IT COMES FROM
Access	A summary of the personal data we process about you and how; the identities of the other fiduciaries and processors we have shared it with; a description of the data shared with each	Act s.11
Correction, completion, updating	We correct what is wrong, complete what is missing and update what is out of date	Act s.12
Erasure	We erase data you no longer want us to hold, unless it is needed for the purpose you gave it or a law requires us to keep it (part 6)	Act s.12
Grievance redressal	A reply to a complaint about how we handled your data	Act s.8(10) and s.13; Rule 14(3)
Nomination	You may nominate one or more people to use these rights for you if you die or cannot act	Act s.14; Rule 14(4)
Withdraw consent	You can withdraw a consent at any time, as easily as you gave it	Act s.6(4); Rule 3(c)

RIGHT	WHAT IT MEANS	WHERE IT COMES FROM
If the GDPR applies to you	Also: restrict or object to processing, receive your data in a portable form, and complain to your supervisory authority	GDPR Arts. 15–22

4. How to make a request, and what identifies you

How (Rule 14(1)(a)).

- Email **founders@graine.ai** with the subject "Data request" (works now); or
- use the request form on our website at www.graine.ai/privacy-policy (also on www.graine.ai/grievance-officer), which gives you a reference number at once; or
- write to The Privacy & Grievance Officer, Mavrix AI Private Limited, Basement, Rajendra Complex, Naya Bans, Near Union Bank, Sector 15, Noida, Gautam Buddha Nagar, Uttar Pradesh – 201301, India.

What identifies you (Rule 14(1)(b), (5)). We need an identifier to find your data. Give one of:

- the email address of your Graine account;
- the phone number a business called or messaged you on, with the name of the business;
- your workspace name, if you are a workspace member.

Proof it is you. We may ask you to confirm who you are before we act, for example by replying from the email address on the account or by confirming details only you would know. We ask for no more than we need. The aim is that nobody else can read or delete your data.

Say what you want. Access, correction (and what is wrong), erasure, withdrawal, nomination, or a grievance. You may write in English; if you prefer another language, say so.

5. What happens next

STEP	WHAT WE DO	WHEN
1. Receipt	We give you a reference number	Within 2 working days
2. Check	We confirm who you are and what you are asking	Within 7 days of receipt
3. Search	We look in the places that can hold your data: account and workspace records, billing, support messages, forms and requests, and for a business's contacts, the records it holds with us	As needed
4. Answer	We reply in writing. For access: a summary and the list of fiduciaries and processors we shared it with. For correction: what we changed. For erasure: what we erased, and what we kept and why	Within 30 days of receipt, never later than 90 days
5. Close	We tell you how to use the grievance process if you disagree	With the answer

There is no charge for a reasonable request. If we need longer than 30 days, we tell you why and when you will have the answer, and it is never later than 90 days.

6. What we may keep, and what we may refuse

- **Records the law makes us keep.** India's Rules (Rules 6(1)(e) and 8(3)) require personal data, traffic data and the logs of its processing to be kept for at least one year from the date of the processing, then erased unless another law requires longer. This applies from 13 May 2027. Tax and company law also require us to keep invoices and billing records for several years. We tell you what we kept and why.
- **A copy in a separate working store.** The copy of a call kept in a separate working store, with its transcript, summary, answers, phone numbers and recording link, is not erased by this process today. Erasure covers the main database, recording storage and memory.
- **A request we cannot verify,** or that is plainly unfounded or abusive. The Act asks Data Principals not to impersonate another person, make false complaints or give false information (section 15). We explain any refusal in writing.
- **Another person's data.** We do not give you data about someone else.
- **Data held for a business.** We cannot decide for the business; we pass the request on (part 2).

7. Nominating someone to act for you

Under section 14 and Rule 14(4) you may nominate one or more people to exercise your rights if you die or cannot act. Write to us from your account email, naming the person, how to reach them, and which rights they may use. When a nominee later asks to act, we ask for proof of the event and of their identity before we do anything.

8. Withdrawing consent

You can withdraw any consent as easily as you gave it: cookie and analytics choices through the cookie settings link on our website; news and offers through the unsubscribe link in each email; anything else by writing to us. Withdrawing does not affect what we did before, and it may mean we can no longer provide a service that needs the data.

9. What works today, and what is being rolled out (as of 3 Nov 2026)

	STATUS
Requests and grievances by email to founders@graine.ai, answered by hand by the Privacy & Grievance Officer	**In place**
A reference number and the due dates for every request sent through the website form, recorded when it arrives	**In place**
The same record, made by hand, for a request that arrives by email or post	**Planned** (it starts with this page's approval; the first monthly check by 3 Dec 2026)
Search and CSV export of calls in a workspace; erasing one person's agent memory; deleting an account on request	**In place**

	STATUS
A request form with automatic reference numbers and due-date tracking (www.graine.ai/privacy-policy and www.graine.ai/grievance-officer)	**In place**
Finding, exporting, correcting and erasing one person's data across calls, transcripts (with tool-call logs, collected answers, extracted data and a contact's last-call summary), recordings and contacts in one step; automatic deletion by retention period. These do not reach the copy of a call kept in a separate working store	**In place** (since 4 Nov 2026)
A sealed one-year copy of what is erased, as Rule 8(3) requires from 13 May 2027, that no one can read through the product	**Being rolled out**

10. If you are not satisfied

Use our **Grievance Redressal Policy** (write to the Grievance Officer at founders@graine.ai). If our reply does not settle the matter, you may complain to the **Data Protection Board of India**; the Act asks you to use our process first (section 13). In the EU or UK you may also complain to your supervisory authority.

11. Contact

founders@graine.ai, for the attention of the Privacy & Grievance Officer. Company: Mavrix AI Private Limited, trading as Graine AI (CIN U62099KA2025PTC210316).

Framework mapping

FRAMEWORK	REFERENCE
DPDP Act 2023 and Rules 2025	Act s.6(4), s.8(9), s.8(10), s.11, s.12, s.13, s.14, s.15; Rule 3(c), Rule 9, Rule 14(1)–(5), Rule 6(1)(e), Rule 8(3)
GDPR	Arts. 12, 15–22
SOC 2 (privacy criteria, if added)	P5.1, P5.2, P8.1
ISO 27001	A.5.34

Revision history

VERSION	DATE	CHANGE	APPROVED BY
1.0	2026-11-03	First issue, approved	Rishabh Bhanot, Founder
1.1	2026-11-04	Call-content encryption and what erasure and retention clear updated	Correction; the approval of 3 Nov 2026 stands

VERSION	DATE	CHANGE	APPROVED BY
1.2	2026-11-04	Controls live after the 4 Nov 2026 deploy	Status update; the approval of 3 Nov 2026 stands
1.3	2026-11-04	What erasure, retention and offboarding do not reach stated	Status update; the approval of 3 Nov 2026 stands