PRIVACY POLICY

United Heavy Equipment & Earth Movers Pvt. Ltd. (XCMG Nepal) | Effective Date: November 2026

1. INTRODUCTION & SCOPE

1.1 United Heavy Equipment & Earth Movers Pvt. Ltd. ('UHEEM', 'Company', 'we', 'us', or 'our'), a private limited company registered in Nepal, is the sole authorized distributor of XCMG construction and earthmoving machinery in Nepal. UHEEM operates the official website available at https://www.uheem.com.np ('Website').

1.2 This Privacy Policy explains how UHEEM collects, uses, stores, discloses, and safeguards personal information ('Personal Data') obtained from visitors, prospective customers, existing customers, and other persons who use the Website or contact UHEEM, including through the contact form, the Customer Satisfaction Survey, and the email addresses and telephone numbers published on the Website. Personal Data means information that identifies, or can reasonably be used to identify, an individual, including an individual contact person acting on behalf of a business.

1.3 UHEEM handles Personal Data in accordance with Article 28 of the Constitution of Nepal, the Privacy Act, 2075 (2018), the Individual Privacy Regulation, 2077 (2020), the Electronic Transactions Act, 2063 (2008), and other applicable laws of Nepal in force from time to time.

1.4 By voluntarily submitting information through the Website, or by otherwise communicating with UHEEM, you acknowledge that you have read and understood this Privacy Policy and, to the extent your consent is required by law, you consent to the collection and use of that information as described in it. If you do not agree with this Privacy Policy, please do not submit Personal Data to UHEEM. You may withdraw your consent at any time as described in Section 7.

2. CATEGORIES OF PERSONAL DATA COLLECTED

UHEEM collects only the Personal Data reasonably needed to respond to enquiries, provide information about XCMG equipment, genuine parts, and after-sales services, improve its services, and comply with the law. Depending on how you interact with the Website, the categories of data collected include:

- **Identity & Contact Data:** Your name, email address, telephone number, company or project name, and any other contact details (such as designation, address, or project location) that you choose to provide.
- **Enquiry Data:** The department you select (Sales, Services, Spare Parts, or General Enquiry), the content of your message, equipment categories or models of interest, and any project details you include (such as project type, timeline, site location, or approximate fleet size).

- **Customer Feedback Data:** Information you submit through the Customer Satisfaction Survey, including your name, email address, telephone number, company or project, equipment model, satisfaction rating, the service area being rated, and your comments.
- **Correspondence Data:** Records of emails, telephone calls, and other communications between you and UHEEM, including brochure requests and consultation requests sent to UHEEM by email or telephone.
- **Technical & Website Usage Data:** Information that may be recorded automatically when you visit the Website, such as your Internet Protocol (IP) address, browser type and version, device and operating system information, referring URL, pages viewed, and access times.

2.2 The Website's contact form and Customer Satisfaction Survey do not require you to provide identity document numbers (such as citizenship, passport, or national identity card numbers), tax identification numbers, bank or financial account information, or credit information. Brochures on the Website may be downloaded without submitting a form. Please do not include such information, or any sensitive information (such as information about your caste or ethnicity, political affiliation, religious belief, or physical or mental health), in forms, messages, or comments. If a particular transaction or request requires additional information from you, UHEEM will tell you what is needed and why before collecting it.

3. LEGAL BASIS AND PURPOSES OF DATA PROCESSING

In accordance with the Privacy Act, 2075 (2018), including its provisions on the collection of personal information with consent and in accordance with law (Sections 12 and 23) and on the use and disclosure of personal information (Section 26), UHEEM collects and uses Personal Data on the basis of your consent or as otherwise permitted or required by law, and only for specified, lawful purposes:

- **Express & Informed Consent:** Processing of the information you voluntarily provide through the Website or in communications with UHEEM, for the purpose for which you provided it, such as responding to an enquiry, providing product, parts, or service information, or recording survey feedback.
- **Responding to Enquiries & Providing Support:** Using Contact, Enquiry, and Correspondence Data to route your message to the appropriate UHEEM department, respond to equipment, spare parts, service, and financing consultation enquiries, and follow up on your request.
- **Service Improvement:** Reviewing Customer Feedback Data and enquiry trends to improve product support, after-sales service, and parts supply.
- **Legal & Regulatory Compliance:** Retaining transaction, invoicing, and accounting records and responding to lawful requests, as required under applicable Nepalese law, including tax laws (such as the Income Tax Act, 2058 (2002) and the Value Added Tax Act,

2052 (1996)) and, where applicable, the Assets (Money) Laundering Prevention Act, 2064 (2008).

- **Website Operation & Security:** Operating, maintaining, and securing the Website, detecting and preventing misuse or fraud, and understanding aggregated Website usage.

UHEEM will not use your Personal Data for a purpose materially different from those stated above without obtaining your consent, unless the law requires or permits otherwise. UHEEM will not use your contact details for unsolicited promotional communications without your consent.

4. COOKIES, TRACKING & WEB ANALYTICS

4.1 Like most websites, the Website may use cookies and similar technologies (small files or identifiers stored on your device) and server logs to keep the Website secure and functioning properly, to remember basic settings, and to understand in aggregate how the Website is used. To the extent they are used:

- **Essential Technologies:** Technical cookies and server logs necessary for the secure and proper operation of the Website, including submission of forms.
- **Performance & Analytics:** Where third-party analytics tools are used, they may collect usage information such as pages visited and device or browser type, which UHEEM uses in aggregated form to improve Website navigation and the presentation of the product catalogue.
- **Embedded Third-Party Content:** The Contact page embeds a Google Maps map showing the UHEEM office location. When that content loads, Google may receive technical information such as your IP address and may set or read cookies under its own privacy policy.

4.2 Managing Cookies: You may restrict or block cookies through your browser settings. However, disabling essential cookies may affect Website functionality, such as submitting the contact form or the Customer Satisfaction Survey.

5. DATA SHARING AND INTERNATIONAL DATA TRANSFERS

5.1 UHEEM does not sell, rent, or trade Personal Data to third parties. UHEEM does not disclose Personal Data without your consent except as permitted or required by the Privacy Act, 2075 (2018) or other applicable law.

5.2 Shared Entities & Authorized Third Parties: UHEEM may share Personal Data with the following entities, only to the extent necessary for the purposes described in Section 3 and, where required by law, with your consent:

- **Original Equipment Manufacturer (XCMG):** As XCMG's authorized distributor in Nepal, UHEEM may share information relating to your enquiry, equipment, or service or

warranty request with Xuzhou Construction Machinery Group Co., Ltd. or its affiliates where necessary to process that request, such as for product, technical, or warranty support.

- **Service Outlets, Technicians & Delivery Partners:** UHEEM's service outlets, field technicians, and transport or delivery partners, to the extent necessary to attend to your service, parts, or delivery request.
- **Banks & Financial Institutions:** Where you request financing-related assistance and ask UHEEM to engage with a bank or other financial institution on your behalf, UHEEM will share only the information necessary for that purpose and only with your consent.
- **IT & Service Providers:** Providers of website hosting, email, website administration, and similar services acting on UHEEM's behalf, whom UHEEM will require to keep Personal Data confidential and to use it only for the services they provide to UHEEM.
- **Governmental & Statutory Authorities:** Courts, law enforcement agencies, the Inland Revenue Department, or other regulatory bodies where disclosure is required or permitted under Nepalese law.

5.3 Cross-Border Data Transfers: Personal Data may be processed or accessed outside Nepal, for example by XCMG in China or by service providers whose servers or services are located abroad. UHEEM will transfer Personal Data outside Nepal only where necessary for the purposes described in Section 3, with your consent where required by law, and will take reasonable steps to ensure that the recipient protects the Personal Data appropriately.

6. DATA SECURITY AND RETENTION PROCEDURES

6.1 Security Measures: Consistent with the duty to protect personal information against unauthorized access, use, change, disclosure, or transmission under the Privacy Act, 2075 (2018), UHEEM takes reasonable administrative, technical, and organizational measures to protect Personal Data, including serving the Website over an encrypted (HTTPS) connection and limiting access to Personal Data to authorized personnel who need it for the purposes described in this Policy. No method of transmission over the internet or of electronic storage is completely secure, and UHEEM cannot guarantee absolute security.

6.2 Data Breach Protocol: In the event of a security incident affecting Personal Data, UHEEM will take prompt steps to investigate and contain the incident, assess the risks to affected individuals, and notify affected individuals and the relevant authorities where required by law or where appropriate in the circumstances.

6.3 Retention Periods: Personal Data is retained only for as long as necessary to fulfill the purposes outlined in this Policy, to resolve disputes, to enforce agreements, or as required by Nepalese law. When Personal Data is no longer needed, UHEEM will delete or anonymize it.

- **Commercial, accounting, and tax records:** Retained for the periods required under applicable Nepalese tax, accounting, and company laws, including the Income Tax Act, 2058 (2002), the Value Added Tax Act, 2052 (1996), and the Companies Act, 2063 (2006).

- **Warranty and service records:** Where UHEEM holds such records, they are retained for as long as needed to support warranty and after-sales service for the relevant equipment.
- **Enquiries, correspondence, and survey responses:** Retained for as long as needed to respond to and follow up on your request and to improve UHEEM's services, and thereafter deleted or anonymized, unless a longer period is required by law or is needed in connection with an ongoing transaction, warranty claim, or dispute.
- **Technical and Website usage data:** Retained only for as long as needed for security, troubleshooting, and aggregated analysis.

7. INDIVIDUAL RIGHTS UNDER NEPALESE LAW

7.1 Under the Privacy Act, 2075 (2018), individuals have statutory protections regarding their personal information, including:

- **Right to Consent:** Personal or family data may be collected, and personal information may be used or disclosed, only with the consent of the person concerned, except as otherwise permitted by law (Sections 12, 23, and 26).
- **Protection of Sensitive Information:** Sensitive information, as defined in Section 27 of the Privacy Act, 2075 (2018), such as information about caste or ethnicity, political affiliation, religious belief, or physical or mental health, is not processed by UHEEM without the consent of the person concerned, except as permitted by law.
- **Right to Request Correction:** The right to request correction of inaccurate personal information (Section 28). UHEEM will, as a matter of good practice, correct inaccurate Personal Data that it holds when notified.

7.2 Additional Commitments: In addition to the statutory protections above, UHEEM will consider in good faith any request from an individual to:

- **Access:** Confirm whether UHEEM holds Personal Data about you and obtain a copy of it.
- **Rectify:** Correct or update inaccurate, incomplete, or outdated Personal Data.
- **Delete:** Delete Personal Data that is no longer needed for the purposes described in this Policy and that UHEEM is not required by law to retain.
- **Withdraw Consent or Object:** Withdraw your consent at any time, where processing is based on consent, without affecting the lawfulness of processing carried out before withdrawal, and object to promotional communications.

7.3 Directives for Exercising Rights: To make a request, please send a written request to info@uheem.com.np, including enough information for UHEEM to verify your identity and identify the Personal Data concerned. UHEEM will respond within a reasonable time. UHEEM may decline or limit a request where permitted or required by law, for example where the data must be retained under Nepalese law, and will explain its reasons. Nothing in this Policy limits any right or remedy available to you under the Privacy Act, 2075 (2018) or other applicable law.

8. THIRD-PARTY LINKS AND INTERACTIVE FEATURES

The Website contains links to external third-party websites and platforms, including UHEEM's pages on Facebook, Instagram, TikTok, and YouTube, and embedded third-party content such as Google Maps. These third parties operate independently and have their own privacy policies. UHEEM is not responsible for the privacy practices, content, or security of third-party websites or services. Users are advised to review the privacy notices of those third parties before disclosing personal information to them, including when contacting UHEEM through social media platforms.

9. CHILDREN'S PRIVACY

The Website is intended for businesses and adults and is not directed at persons under the age of eighteen (18). UHEEM does not knowingly collect Personal Data from children. If you believe that a child has provided Personal Data to UHEEM, please contact UHEEM using the details in Section 10 so that it can be deleted.

10. POLICY UPDATES AND CONTACT DETAILS

10.1 Amendments: UHEEM may amend this Privacy Policy from time to time to reflect changes in applicable law (including any new data protection or information technology legislation enacted in Nepal), technological developments, or changes to the Website or its practices. Revised policies will be published on the Website with an updated 'Effective Date'. Where required by law, UHEEM will seek your consent before using Personal Data for a materially different purpose.

10.2 Governing Law: This Privacy Policy is governed by the laws of Nepal, and the courts of Nepal shall have jurisdiction over any dispute arising from it.

10.3 Contact Information: For privacy-related inquiries, data access or correction requests, or complaints, please contact UHEEM:

- **Entity:** United Heavy Equipment & Earth Movers Pvt. Ltd. (UHEEM)
- **Office Location:** Ananda Nagar, Kathmandu, 44600, Nepal
- **Telephone:** +977-01-4542901
- **Email:** info@uheem.com.np
- **Contact Form:** https://www.uheem.com.np/contact