

Privacy Policy

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By accessing this website, by participating in our data collection outreach initiatives, and/or by availing any of the services, you agree to the terms of this Data Privacy and Protection Policy.

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1. TERMS USED IN THIS POLICY

In this Data Privacy and Protection Policy:

- "Cookies" mean small files that are placed on your computer, mobile device or any other device by a website, containing, among other information, the details of your browsing history on that website.
- "GDPR" means the EU General Data Protection Regulation.
- "Personal Data" means any information relating to an identified or identifiable natural person.
- "Policy" means this Data Privacy and Protection Policy.
- "Service" refers to a service that Netscribes' provides, for a fee or gratis. You are using our Service when you actively sign up or sign in to get access to any Service provided by us.
- "we", "us", "our", and "Netscribes" refer to Netscribes (India) Private Limited.
- "Website" refers to Netscribes' website. You are using our "website" when you are visiting our website
- "you" refers to you, as a user or subscriber of the services provided by us.

3. OUR COMMITMENT TOWARDS PROTECTING PERSONAL INFORMATION

Your privacy is important to us. We will use your personal information only in the manner set out in this Policy. We act in accordance with the applicable data protection laws, including GDPR.

We are committed to safeguarding the privacy of our website visitors, clients, prospects, and research participants. This Policy sets out how we deal with your personal information.

Our commitment towards protecting your personal information includes the following obligations:

- We promise to protect your privacy and treat the information you give us as confidential.
- The information you provide to us will be used by us only for the purpose for which it was sought.
- We will not release your personal information to any third party without your consent.

- We will never try to sell you anything and we will never sell your personal data to anyone.
- Your decision to provide or not to provide any information will be respected without question.

4. WHAT DATA DO WE COLLECT OR PROCESS ABOUT YOU, AND FOR WHAT PURPOSE?

- **We may process data about your use of our website and services (“usage data”).** The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of your visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your Service use. The source of the usage data is our analytics tracking system. In addition, we may use third-party analytics tracking services such as Google Analytics and Facebook Pixel. This usage data may be processed for the purposes of analysing the use of the Website and Services in order to improve our performance metrics, and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely monitoring and improving our Website and Services.
- **We may process your data that is provided to us during the course of our surveys (“response data”).** The response data may include your name, age, area of residence, email address, your responses to the questions that we may ask you. The source of the response data is you. The response data may be processed for the purposes of providing our services, ensuring the integrity of our operations and processes, maintaining back-ups of our databases, and for communicating with you. The legal basis for this processing is your consent.
- **We may process your information included in your personal profile on our website (“profile data”).** The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our Website and Services.
- **We may process your personal data that are provided in the course of the use of our Services (“service data”).** The service data may include your name, address, telephone number, email address. The source of the service data is you or your employer. The service data may be processed for the purposes of providing our Services, ensuring the security of our Website and Services, maintaining back-ups of our databases, and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our Website and business. In some cases, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- **We may process information that you post for publication on our Website or through our Services (“publication data”).** The publication data may be processed for the purposes of enabling such publication and administering our Website and Services. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our Website and business. In some cases, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- **We may process information contained in any enquiry you submit to us regarding goods and/or services (“enquiry data”).** The enquiry data may be

processed for the purposes of offering, marketing and selling relevant goods and/or services to you and for and for communicating with you. The legal basis for this processing is your consent.

- **We may process information relating to our customer relationships, including customer contact information (“customer relationship data”).** The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications, promoting our products and services to customers, and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our Website and business. In some cases, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- **We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website (“transaction data”).** The transaction data may include your contact details, your banking details, your credit card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services, keeping proper records of those transactions, and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our business. In some cases, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- **We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (“notification data”).** The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters, and for communicating with you. The legal basis for this processing is your consent.
- **We may process information contained in or relating to any communication that you send to us (“correspondence data”).** The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our Website and business and communications with our business counterparts.

In addition to the specific purposes for which we may process your personal data set out in this Section, we may process any of your personal data identified in this Policy where necessary for:

- the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. WHOM DO WE SHARE YOUR DATA WITH?

- We may disclose your personal data to **any of our employees, officers, and agents** as long as such disclosure is reasonably necessary for the purposes, and on the legal bases, set out in this Policy.
- We may disclose your personal data to **any member of our group of companies** (this means our ultimate holding company and all its subsidiaries and joint venture partners) as long as such disclosure is reasonably necessary for the purposes, and on the legal bases, set out in this Policy.
- We may disclose your personal data to **our insurers and professional advisers** as long as such disclosure is reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- We may disclose your personal data to **our suppliers or subcontractors** as long as such disclosure is reasonably necessary for providing Services to you.
- Financial transactions relating to our Website and Services may be handled by **our payment services providers**. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.
- We may disclose your personal data to **third party suppliers of goods and services** for the purpose of enabling them to contact you so that they can offer, market and sell to you the relevant goods and/or services.
- In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

We will not sell, share, rent or otherwise intentionally transfer your name, address, telephone number or e-mail address to market research companies, direct marketing companies or anyone else. The only exceptions when we may disclose your personal information to third parties are as follows:

- You request us to share, or consent to us sharing, your data with the third parties for a specified purpose
- We provide your responses to a third party who is contractually bound to keep the information confidential and use it only for research or statistical purposes
- In the rare but possible circumstance that the information is subject to disclosure pursuant to judicial or other government subpoenas, warrants, orders or for similar legal or regulatory requirements.

6. HOW LONG DO WE RETAIN YOUR DATA?

Your personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We will retain your personal data as follows:

- **Usage data** will be retained for a minimum period of one week following the date of your visit, and for a maximum period of ten years following the date of your visit.
- **Response data** will be retained for a minimum period of one month following the submission of your response, and for a maximum period of ten years following the submission of your response.

- **Profile data** will be retained for a minimum period of one day following the date of deletion of your profile on our Website, and for a maximum period of ten years following such deletion.
- **Service data** will be retained for a minimum period of one month following the fulfilment of the Service, and for a maximum period of ten years following the last date on which any obligation in respect of such Service concludes.
- **Publication data** will be retained for a minimum period of one week following the publication of such data, and for a maximum period of ten years following the date on which such data is removed from such publication.
- **Enquiry data** will be retained for a minimum period of one day following the date of the enquiry, and for a maximum period of ten years following the date of the enquiry.
- **Customer relationship data** will be retained for a minimum period of one month following the conclusion of the said relationship, and for a maximum period of ten years following the conclusion of the said relationship.
- **Transaction data** will be retained for a minimum period of one week following the date of the transaction, and for a maximum period of ten years following the date of the transaction.
- **Notification data** will be retained for a minimum period of one day following the date of unsubscribing from our newsletters, and for a maximum period of ten years following the date of request for such unsubscribing.
- **Correspondence data** will be retained for a minimum period of one day following the date of the communication, and for a maximum period of twenty years following the date of the communication.

In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

Sr. No.	Category of Data	Factors on which period of retention will be based
1.	Usage data	Parameters of usage being analysed
2.	Response data	Terms of Service under which the response is solicited
3.	Profile data	Nature of utilization of profile
4.	Service data	Nature of Service; covenants of Service contract
5.	Publication data	Means of publication; citation of publication in other works
6.	Enquiry data	Means of enquiry; nature of Service enquired for
7.	Customer relationship data	Nature of relationship; covenants of Service contract
8.	Transaction data	Nature of transaction; covenants of Service contract
9.	Notification data	Terms of opt-in
10.	Correspondence data	Nature of correspondence; requirements of law

Notwithstanding the foregoing provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. TRANSFER OF YOUR DATA

As a part of our service obligations to our clients, we may be engaged by data exporters, data importers or other sub-processors to process your personal data on their behalf. Your information, including your personal data, may be processed at our operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. Your consent to this privacy policy followed by your submission of such information represents your agreement to such transfer. We will take all steps reasonably

practicable to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Your personal data may be transferred to us outside of the European Union ("EU") or the European Economic Area ("EEA"). All such transfers shall be in accordance with the provisions of the applicable law and regulations, including, if applicable, the EU General Data Protection Regulation 2016/679. EU's data protection directive 95/46/EC, which deals with the transfer of personal data to processors established in third countries which do not ensure an adequate level of data protection, requires that we undertake certain obligations in respect of such data, including the execution of a Standard Contractual Clauses with the concerned data exporter. Accordingly, we will provide at least the level of privacy and protection to your data that the applicable laws require us to provide. However, we are only responsible for our own activities and are not liable for the actions of such data exporters, data importers or other sub-processors.

8. WHAT ARE YOUR RIGHTS REGARDING YOUR DATA WITH US?

This Section summarises the rights that you have under data protection law. Please note that some of the rights available to you are convoluted and may not be represented in detail in this Policy. We advise you to peruse the relevant laws for a complete understanding your rights. Your principal rights concerning your Personal Data under GDPR are as below:

- **Right to access:** You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data.
Subject to the condition that the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can request your personal data with us, by emailing us on privacy@netscribes.com.
- **Right to rectification:** You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- **Right to erasure:** In certain circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data provided to us is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed.
However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- **Right to restrict processing:** In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you do not desire erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- **Right to object to processing:** You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose. You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- **Right to data portability:** To the extent that the legal basis for our processing of your personal data is: (a) consent; or (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- **Right to complain to a supervisory authority:** If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- **Right to withdraw consent:** To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal. You may exercise any of your rights in relation to your personal data by a written notice to us on privacy@netscribes.com. In order for us to comply with your request, your notice must clearly state the right that you wish to exercise and identify your information in respect of which you wish to exercise such right. Please note that as a security measure, we may require you to verify your identity before accepting any request concerning your Personal Data.

You may exercise any of your above rights by contacting us with your specific requirement. Our contact information is provided at the end of this document. Do note that when we receive a request concerning your data with us, we may require you to provide a clear copy of a valid government issued ID document in order to verify your identity. To know more about our process of verification of your identity, please contact us on the details provided in this document.

9. HOW DO WE USE COOKIES?

A cookie is a file containing a unique identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies do not typically contain any information that personally identifies you, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use cookies for the following purposes:

- **Advertising.** We use cookies to help us to display advertisements that will be relevant to you.
- **Analysis.** We use cookies to help us to analyse the use and performance of our website and services.
- **Authentication.** We use cookies to identify you when you visit our website and as you navigate our website.
- **Cookie consent.** We use cookies to store your preferences in relation to the use of cookies more generally.
- **Personalisation.** We use cookies to store information about your preferences and to personalise the website for you.
- **Security.** We use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally.
- **Status.** We use cookies to help us to determine if you are logged into our website.

Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, that is, when the web browser is closed. We use both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**
 Type: Session Cookies
 Administered by: Us
 Purpose: These Cookies are essential to provide you with services available through the website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and We only use these Cookies to provide you with those services.
- **Cookies Policy / Notice Acceptance Cookies**
 Type: Persistent Cookies
 Administered by: Us
 Purpose: These Cookies identify if users have accepted the use of cookies on the Website.
- **Functionality Cookies**
 Type: Persistent Cookies
 Administered by: Us
 Purpose: These Cookies allow us to remember choices you make when you use the website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the website.

In addition to the cookies mentioned above, additional cookies may be used by third-party service providers. Such third-party service providers use cookies and those cookies may be stored on your computer when you visit our website.

- We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google’s privacy policy is available at: <https://www.google.com/policies/privacy/>.
- We publish Google AdSense interest-based advertisements on our website. These are tailored by Google to reflect your interests. To determine your interests, Google

will track your behavior on our website and on other websites across the web using cookies. You can view, delete or add interest categories associated with your browser by visiting: <https://adssettings.google.com>. You can also opt out of the AdSense partner network cookie using those settings or using the Network Advertising Initiative's multi-cookie opt-out mechanism at: <http://optout.networkadvertising.org>. However, these opt-out mechanisms themselves use cookies. This means that if you clear the cookies from your browser, your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at: <https://support.google.com/ads/answer/7395996>.

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Opera: <http://www.opera.com/help/tutorials/security/cookies/>
- Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- Safari: <https://support.apple.com/kb/PH21411>
- Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

10. SECURITY OF YOUR DATA

The security of your personal data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

11. CHILDREN'S PRIVACY

Our services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers. If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

12. LINK TO OTHER WEBSITES

Our services may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

13. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. We will update the "Last updated" date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

14. CONTACT US

- This Website is owned and operated by Netscribes Data & Insights Private Limited

- We are registered in India under registration number U72900MH2000PTC126630, and our registered office address is: Office No. 504, 5th Floor, Lodha Supremus, Senapati Bapat Marg, Lower Parel, Mumbai 400 013, Maharashtra, India
- You can contact us (a) by post: at our registered office address provided above; (b) by email: on privacy@netscribes.com; (c) by telephone: on the contact number published on our Website from time to time; (d) by Website: by using our website contact form on <https://www.netscribes.com/contact/>.