

This Privacy Statement ('Statement') is an elaborative description of how Service Provider collects, shares and/or processes the personal data that is shared by individuals or organizations and also serves as an explainer on the privacy related rights pertaining to personal data.

Service Provider, its affiliates and subsidiaries (hereinafter collectively referred to as 'Service Provider') understand and value the importance of protecting the personal data that the User shares with Service Provider.

This Statement is applicable to all users of the Service Provider website, Service Provider's Customers who avail Service Provider's services, its Vendors, persons/individuals who participate in any marketing/recruitment activities, events etc. hosted by Service Provider and also to all persons/stakeholders who are involved in any transaction with Service Provider where there is any use/collection/sharing of personal information (hereinafter collectively referred to as the 'User').

#### **The personal data that Service Provider collects about the User:**

Service Provider does not and will not collect any personal data about the User unless such User provides it to Coud4C voluntarily. Service Provider collects information during User's interactions with Service Provider, whether through business related interactions or online, including through Service Provider's websites that is necessary to conduct its business, to provide the services to the customers, as part of business operations and optimisation of its service offerings.

Service Provider may collect, use, store and transfer different kinds of personal data which have been grouped together as follows:

- Identity Data: including first name, last name.
- Contact Data: including address, email address, and telephone numbers.
- Marketing and Communications Data: including User's preferences in receiving marketing from Service Provider (including authorised third parties) and User's communication preferences.
- Public PII is easily accessible from public sources like phonebooks, the Internet, and corporate directories Visiting Cards, Business telephone number and Business mailing or email address.

#### **How is the User's personal data collected?**

Generally, Service Provider collects personal information related to employees, customers and representatives when they decide to interact with us, or avail services or express an interest or apply for a position. The kind of data that Service Provider collects and/or has visibility/access to, depends solely on the context and the nature of User's interaction with Service Provider and in case of Service Provider's customers, the nature service offering that such customer avails from Service Provider. Service Provider do not solicit and/or collect any sort of personal information that is irrelevant/not necessary for the provision of services to the User. Service Provider further declare that it does not participate in any sort of data mining activities whatsoever, with any third parties.

**Purposes for which Service Provider may use the personal data belonging to the User:**

Service Provider may use personal information for the following purposes only:

- To engage in activity in relation to Service Provider’s member services. This may include sending updates, meeting invite and other information that may be of important.
- where anyone has applied for a position with Service Provider, to review and process job application
- To comply with legal or regulatory obligations that Service Provider are obliged to discharge.
- To verify identify and entitlements to Service Provider’s products and services when the User contacts Service Provider or access its services.
- To supply services and manage payments.
- To send statements and invoices, and collect payments.
- To provide commercial quotes.
- To provide technical and customer support.
- To obtain feedback on Service Provider’s services.
- To provide improved website and product experience and communications informed by product subscriptions and/or data collected.

Service Provider undertakes that Service Provider uses personal data strictly in compliance with applicable laws.

**Purposes for which Service Provider may collect the personal data belonging to the User and the rationale behind such collection:**

Service Provider uses personal information only where required for specific purposes. The following table serves as an explainer for the purpose for which Service Provider collects/uses of the personal data belonging to the User and the rationale behind such collection/use:

Purpose/Instance	Rationale
Managing Service Provider’s contractual and/or employment relationship with the User.	Necessary for the performance of a contract to which User is a party.
Recruitment.	As an employer, Service Provider collects User’s personal information in order to manage and carry out the recruitment process and User’s employment with Service Provider.
Facilitating communication with the User (including in case of emergencies, and to provide User with requested information).	To ensure proper communication and emergency handling within the organization. This kind of collection includes collection of basic contact information of relevant stakeholders.
Operating and managing Service Provider business operations.	To ensure the proper functioning of Coud4C business operations and optimise Service Providers service offerings.
Complying with legal requirements.	This is a legitimate purpose as Service Provider is bound by and is subject to all applicable laws and legal mandates.

Purpose/Instance	Rationale
Monitoring User's use of Service Provider systems (including use of Service Provider website ).	To avoid compliance related issues and protecting the standards of Service Providerservice offerings, ensuring that they meet the legal requirements and industry standards.
Improving the security and functioning of Service Provider website, networks and information.	To ensure that User receives an excellent user experience and Service Provider networks and information are secure.
Undertaking data analytics, i.e. applying analytics to business operations and data to describe, predict and improve business performance within Service Provider and/or to provide a better user experience.	To ensure the proper functioning of Service Provider business operations and optimise Service Provider service offerings.
Marketing Service Provider products and services toUser.	To ensure the proper functioning and growth of Service Provider business operations. However, any kind of collection for this purpose will be subject to User's consent and privacy rights.
Customers billing address, email address, and telephone numbers and prospective clients information	For performance of contract.

**Purposes for which Service Provider may share personal data belonging to the User:** Service Provider shares the User's personal data with the User's consent and/or to carry out any transaction and/or provide any service that the User has authorized or requested. Service Provider also shares any such personal data with its wholly owned subsidiaries and affiliates whenever necessary, to optimize Service Provider's service offerings.

Further, Service Provider may also share User's personal data with its vendors/suppliers/third parties wherever necessary on strict need to know basis, ensuring that such parties are bound by the privacy principles detailed herein and are bound by strict confidentiality obligations.

Lastly, Coud4C shares personal data when required by applicable laws/legal mandates and/or in order to respond to any legal process, including but not limited to protection of the rights and property of Service Provider and its customers.

**How Service Provider protects personal data belonging to the User:**

Service Provider is committed to protecting its User's personal data. Service Provider has put in place safeguards including appropriate technologies, policies, and contractual arrangements, so that the data that Service Provider possesses about the Users is protected from unauthorized access and improper use.

The safeguards Service Provider have put in place to protect User's personal data include the following Technical and Organizational Measures:

1. Organizational management is responsible for the development, implementation, and maintenance of Service Provider's Privacy program.

2. External Audits will be conducted annually once. Any gaps identified in the audit, will be addressed with corrective action for information security and the cloud operations.
3. Maintain Information security policies and make sure that policies and measures are regularly reviewed and where necessary, improve them
4. Communication with Service Provider applications utilizes cryptographic protocols such as TLS to protect information in transit over public networks.
5. Data security controls which include logical segregation of data, restricted (e.g. role-based) access is used.
6. Logical access controls designed to manage electronic access to data and system functionality based on authority levels and job functions.
7. Password controls designed to manage and control password strength, and usage including prohibiting users from sharing passwords.
8. **Physical Access Control:**
  1. Unauthorized persons shall be prevented from gaining physical access to premises, buildings or rooms where data processing systems are located which process and/or use Personal Information.
  2. Measures: All Datacentres adhere to strict security procedures enforced by guards, surveillance cameras, access control mechanisms and other measures to prevent equipment and Datacentre facilities from being compromised. Only authorized representatives have access to systems and infrastructure within the Datacentre facilities. To ensure proper functionality, physical security equipment (e.g. cameras, etc.) are maintained on a regular basis. In detail, the following physical security measures are implemented at all Datacentres:
9. Service Provider protects its assets and facilities using the appropriate means based on a security classification conducted by security department.
10. In general, buildings are secured through access control systems (smart card access system).
11. Change management procedures and tracking mechanisms designed to approve and monitor all changes to Service Provider technology and information assets.
12. Incident / problem management procedures design to allow Service Provider investigate, respond to, mitigate and notify of events related to Service Provider technology and information assets.
13. Vulnerability assessment, patch management, and threat protection technologies and scheduled monitoring procedures designed to identify, assess, mitigate and protect against identified security threats, viruses and other malicious code.

### **Network and Information Security**

Service Provider maintains a variety of physical, electronic, and procedural safeguards to protect personal information. Also, uses encryption technologies to protect account information when customers viewing the bill on Website or via email. Customers should be aware that Service Provider has no control over the security of other sites on the Internet that they might visit, interact with to buy the products or services.

Customers should keep the user name, password or other access information safe to protect against unauthorized access to account information and services. And customers must adopt strong passwords that others may not guess easily.

### **User's rights pertaining to its personal data and privacy:**

Subject to applicable laws, all Users have the following rights:

- Right to obtain information regarding the processing of personal information and access to the personal information which Service Provider holds.
- Please note that there may be circumstances in which Service Provider are entitled to refuse requests for access to copies of personal information as per applicable laws. In particular, information that is subject to legal professional privilege will not be disclosed other than to Service Provider affiliates/subsidiaries and as authorised by such affiliates/subsidiaries.
- Right to request Service Provider to correct any personal information if it is inaccurate or incomplete.
- Right to request Service Provider to erase personal information in certain circumstances. Please note that there may be circumstances where Service Provider may erase personal information but Service Provider is legally entitled to retain it.
- Right to object to and request that Service Provider restricts, its processing of personal information in certain circumstances. Again, there may be circumstances where the User objects to, or asks Service Provider to restrict, its processing of personal information but Service Provider is legally entitled to refuse that request.
- Right to withdraw consent, although in certain circumstances it may be lawful for Service Provider to continue processing without User consent if permissible under law.
- And any other rights that User may hold as the owner of such data as per applicable laws.

### **Content**

All hosting services provided by Service Provider may be used for lawful purposes only. Transmission, storage, or presentation of any information, data or material in violation of any Indian law is prohibited. This includes, but is not limited to copyrighted material, trade secret, material in our opinion is obscene, not in public interest, opposed to public policy or is an invasion of privacy of any person or entity. All pornographic content and sex-related merchandising is prohibited on all Service Provider servers. This includes sites that may infer sexual content or links to adult content elsewhere. Service Provider will be the sole arbiter in determining violations of this provision. Also prohibited are sites that promote any illegal activity or present content that may be damaging to Service Provider servers or any other server on the internet. Links to such materials are also prohibited. Examples of unacceptable content or links: Pirated software Hacker programs or archives Warez sites, Service Provider will be the sole arbiter as to what constitutes a violation of this provision.

#### **Materials and Products**

1. We will exercise no control whatsoever over the content of the information passing through the network or on the Customer's websites.
2. We make no warranties or guarantees of any kind, whether expressed or implied for the service provided and also disclaims any warranty of merchantability or fitness for particular purpose and will not be responsible for any damages that may be suffered by the Customer, including loss of data

- resulting from delays, non-deliveries or service interruptions or gaps by any cause or errors or omissions of the Customer.
3. Service Provider is not responsible for any loss, erasure, or corruption of Customer's data or files whatsoever unless agreed otherwise
  4. Use of any information obtained by way of Service Provider is at the Customer's own risk, and we specifically deny any responsibility for the accuracy or quality of information obtained through our services.

### **Changes to this Privacy Policy**

Service Provider reserves the right to amend, alter, or modify this Privacy Statement at any time in its sole and absolute discretion. Any amendment or modification is effective when posted on public domain and any use of Service Provider services after the posting of a modification or amendment will be considered deemed acceptance of those modifications.

### **Webmaster**

Any Security breaches, bugs and updates on the website, please inform the [Webmaster](#).

### **Cookie Policy**

At **Service Provider.com ("We", "us", "our")**, we strive to honour the privacy and security of any data we collect from visitors using our website, whilst we act as a personal data Controller under relevant data protection rules and regulations. Our website uses cookies, in combination with pixels, local storage objects, and similar devices (collectively, "cookies" unless otherwise noted) to distinguish you from other users of the website. This helps us provide you with a good experience, improve our service, and to personalize ads and content to you while you use the website.

This **Cookie Policy** describes the types of the cookies we use on the website and our purposes for using them.

If you have questions about this Cookie Notice, please contact us at [email / web form link]. For a more complete description and list of the cookies that we currently use on the website, please review our Cookie List found in section 5 of this document. For more information about our privacy practices, please review our privacy policy: URL of Service Provider. If you have any questions or comments regarding this notice or data privacy.

Please read this Cookie Notice carefully for details about why we use cookies and the information they collect from and about you.

### **Cookie Definitions**

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device, which is like computer memory. This helps deliver users with the most relevant web experiences for his/her benefits.

**First and third-party cookies:** whether a cookie is 'first' or 'third' party refers to the domain placing the cookie.

1. *First-party cookies* are those set by a website that is being visited by the user at the time (e.g. cookies placed by our website domain).
2. *Third-party cookies* are cookies that are set by a domain other than that of the website being visited by the user. If a user visits a website and another entity sets a cookie through that website, this would be a third-party cookie.

**Persistent cookies:** these cookies remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

**Session cookies:** these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

**What Cookies Do We Use and Why?**

Generally, the website uses cookies to distinguish you from other users of the website. This helps us to provide you with a good experience in terms of relevance, performance, security, and usability when you browse the website and also allows us to improve it. The cookies we may use on the website may be categorized as follows:

1. Strictly necessary
2. Performance
3. Functionality
4. Targeting

Some cookies may fulfil more than one of these purposes.

**'Strictly Necessary' cookies** let you move around the website and use essential features like secure areas. Without these cookies, we cannot provide the requested services.

*We use these Strictly Necessary cookies to:*

- Identify you as being logged in to the website and to authenticate you
- Make sure you connect to the right service on the website when we make any changes to the way it works
- For security purposes
- Make sure you connect to the right service on the website when we make any changes to the way it works

If you prevent these cookies, we can't guarantee how the website or the security on the website will perform during your visit.

**'Performance' cookies** collect information about how you use the website, e.g. which pages you visit, and if you experience any errors. These cookies do not collect any information that could identify you and are only used to help us improve how the website works, understand the interests of our users and measure the effectiveness of our advertising purposes to deliver the most relevant offerings to you.

*We use performance cookies to:*

- Carry out web analytics: Provide statistics on how the website is used
- Perform affiliate tracking: Provide feedback to affiliated entities that one of our visitors also visited their site
- Obtain data on the number of users of the website that have viewed a product or service
- Help us improve the website by measuring any errors that occur
- Test different designs for the website

Some of our performance cookies are managed for us or by third parties committed to deliver the best experiences for your needs.

**'Functionality' cookies** are used to provide services or to remember settings to improve your visit or sessions within the website.

We use 'Functionality' cookies for such purposes as:

- Remember settings you've applied such as layout, text size, preferences and colors
- Remember if we've already asked you if you want to fill in a survey
- Remember if you have engaged with a specific component or list on the website so that it won't repeat
- Show you when you're logged in to the website
- To provide and show embedded video content

Some of these cookies are managed for us by third parties

**'Targeting' cookies** are used to track your visit to the website, as well other websites, apps and online services, including the pages you have visited and the links you have followed, which allows us to display targeted ads to you on the website.

We may use *targeting cookies* to:

- Display targeted ads within the website.
- To improve how we deliver personalized ads and content, and to measure the success of ad campaigns on the website.

#### **When do we require your consent**

All cookies require your consent.

We request your consent before placing them on your device. You can give your consent by clicking on the appropriate button on the banner displayed to you. If you do not wish to give consent or wish to withdraw your consent to any cookies at any time, you will need to delete, and block or disable cookies via your browser settings; see below for more information on how to do this. Please note that disabling these cookies will affect the functionality of the website, and may prevent you from being able to access certain features on the website.

#### **How to Delete and Block our Cookies**

Most web browsers allow some control of most cookies through the browser settings. However, if you use your browser settings to block all cookies (including strictly necessary cookies), you may not be able to access all or parts of the website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit the website.

***Changing your Cookie Settings.*** The browser settings for changing your cookies settings are usually found in the 'options' or 'preferences' menu of your internet browser. In order to understand these settings, the following links may be helpful. Otherwise you should use the 'Help' option in your internet browser for more details.

- [Cookie settings in Internet Explorer](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Chrome](#)
- [Cookie settings in Safari](#)