

PRIVACY POLICY

THIS PRIVACY POLICY (“**PRIVACY POLICY**”) SETS FORTH HOW SECUR CREDENTIALS LTD. USES AND PROTECTS THE PERSONAL INFORMATION THAT “YOU” PROVIDE TO US. THIS PRIVACY POLICY APPLIES TO PERSONAL INFORMATION COLLECTED BY US THROUGH ONLINE AS WELL AS OFFLINE MODES. PLEASE READ THIS PRIVACY POLICY CAREFULLY.

OBJECTIVE

Our Company is committed to the privacy and confidentiality of every person who share their Personal Information with the Company. This Privacy Policy describes the Company’s policies and practices with regard to handling of or dealing in Personal Information collected by the Company. We respect your privacy and consider it an important element of our business. We conduct our business in compliance with applicable laws on data privacy protection and data security. This Privacy Policy is governed by and is compliant with the **Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011**, which is designed to protect the Personal Information; and other applicable rules and regulations related to privacy.

Definitions

The definitions of some of the key terms used in this Policy are given below:

- a. "Cyber incidents" means any real or suspected adverse event in relation to cyber security that violates an explicitly or implicitly applicable security policy resulting in unauthorized access, denial of service or disruption, unauthorized use of a computer resource for processing or storage of information or changes to data, information without authorization;
- b. "Personal Information" means any information belonging to the User that is capable of identifying such User collected by the Company on its Website, including but not limited to the name, email, address as may be applicable.
- C. “Sensitive Personal Data” of a person means such Personal Information which consists of information relating to;—
 - (i) Financial information such as Bank account or credit card or debit card or other payment instrument details;
 - (ii) Physical, physiological and mental health condition;
 - (iii) Sexual orientation;
 - (iv) Medical records and history;
 - (v) any of the information received under above clauses by us for processing and/or stored or processed under lawful contract or otherwise:

Collection of Personal Information

We may collect your name, email, mobile number, phone number, residential address and IP address or any other Personal Information including Sensitive Personal Data when you visit or interact on the Website. We may also collect your Personal Information including Sensitive Personal Data when you register / enquire yourself on our website i.e. www.secur.co.in. We may use cookies and other tracking technology which collect certain kinds of Non-Personal Information when you interact with our website.

We use Personal Information including Sensitive Personal Data after seeking your consent and in ways, which is not in any manner that would have unjustified adverse effects on you. By submitting your

Personal Information manually or in electronic form to us and/or by using our website, you give your consent that all Personal Information including Sensitive Personal Data submitted on each occasion may be processed by and/or shared with us and our affiliates, in the manner and for the purposes described in this Privacy Policy.

Non-Personal Information

Our Website may also collect Non-Personal Information. For example, as you browse our Website, we may collect information about your visit, but not about you personally via web server logs. For example, we may monitor statistics such as: the number of people that visit our site, which page(s) are visited on our site, from which domain our visitors come, and which browsers people use to visit our site etc.

Cookies

A "cookie" is a small piece of information stored by a web server on a web browser so it can be later read back from that browser. Cookies are useful for enabling the browser to remember information specific to a given user.

We may store temporary or permanent cookies on your computer. You can erase or choose to block these cookies from your computer. You can configure your computer's browser to alert you when we attempt to send you a cookie. However, please note that, if you have turned cookies off, you may be prevented from using certain features of the Website.

Use of Personal Information

We use Personal Information including Sensitive Personal Data for lawful purposes and only in connection with business activity of the Company and we ensure that such use is "fair" and "lawful".

We may use Personal Information including Sensitive Personal Data:

- a) to better provide you with the required services or information;
- b) to send you our promotional information;
- c) to assist you, in case you face any technical difficulties while using our Website;
- d) to alert you to updated information and services;
- e) to respond to your queries;
- f) to improve the content of our website for your reference.
- g) to provide you information that we may believe may be of your interest;
- h) for internal record keeping; and
- i) to comply with our legal or statutory obligations.

Data retention

The Personal Information including Sensitive Personal Data, you submit to us will only be retained for as long as is required for the purposes for which it was collected. We may, however, also need to retain copies of information for internal record-keeping purposes and/or for compliance with applicable law or professional standards.

Update & modification of Personal Information

When requested and practicable, you may update your Personal Information including Sensitive Personal Data by contacting us. We are committed to providing reasonable and practical access to the providers of the said information to allow them an opportunity to identify and correct any inaccuracies. When Personal Information including Sensitive Personal Data is retained by us, we assume responsibility for keeping an accurate record of the Personal Information including Sensitive Personal Data, once you have submitted and verified the same. However, we do not assume responsibility for verifying the accuracy and authenticity of the content of information provided by you. When practically possible, if we are informed that any Personal Information including Sensitive Personal Data collected by us is no longer accurate, we will make appropriate corrections / deletions based on the updated information provided by you.

Disclosure / Transfer of Personal Information

We do not sell, rent, share, distribute, lease or otherwise provide your Personal Information to third parties, without your prior consent. Personal Information including Sensitive Personal Data collected by us may be disclosed or transferred to third party contractors, subcontractors, subsidiaries and/or affiliates (each, a "Third Party"), for the purposes for which you have submitted the information and for the administration of our system and/or other internal, administrative or operational purposes. Each Third Party is required to provide the same level of data protection to your Personal Information including Sensitive Personal Data as we provide under this policy. By submitting your Personal Information, you are providing explicit consent to the transfer of such information for the fulfilment of your voluntary requests or otherwise.

We may disclose your Personal Information including Sensitive Personal Data to Government authorities including but not limited to authorities such as Unique Identification Authority of India, Income Tax Authorities, and similar authorities mandated under the law to obtain information for the purpose of verification of identity or for prevention, detection, investigation including cyber incidents, prosecution and/or punishment of offences or to the third parties as and when required by law through court notice, search warrant or other legal process or requirement, for regulatory compliance purposes, when explicitly requested by them in writing. You understand that we shall not seek your consent while disclosing your Personal Information including Sensitive Personal Data to such governmental authorities.

Security of Personal Information

As we value your Personal Information, we ensure an adequate level of data protection from accidental loss, theft, destruction, damage, unauthorized or unlawful processing. We store your Personal Information including Sensitive Personal Data in secure operating environments and only accessible to our employees, agents and contractors on a need-to-know basis. We also follow generally accepted industry standards in this respect. We are an ISO 27001:2013 certified organization. We believe in being proactive in managing risk and security of your Personal Information. We have put in place physical, electronic, and managerial procedures to safeguard and secure the Personal Information we collect through our sites and the provision of our Services. However, data pilferage due to unauthorized hacking, virus attacks, technical issues is possible, and we take no liabilities or responsibilities for it.

Reservation of Rights

All rights not expressly granted in this Privacy Policy are reserved by the Company and its licensors, as the case may be. Nothing contained in this Privacy Policy shall be construed as conferring by implication, estoppel or otherwise any license or right under any copyright, patent, trademark or other intellectual property right of or any other person or to the User.

Changes to this Policy

This Privacy Policy is subject to change, and any changes to this Privacy Policy will be posted on our Website. All information submitted through our site is subject to the terms and conditions of this Privacy Policy, as amended.

This Privacy Policy was last modified in June 2018.

How to contact us

If you do not wish to be contacted by us or if you wish to withdraw your consent given earlier or have any questions about our Privacy Policy or Personal Information we hold about you or if you wish to opt out of marketing materials, you may contact to the below designated officer.

Mr. Richard Desouza
Grievance Officer,
Plot no. G-4, MIDC Cross Road A,
Andheri (East), Mumbai-400093.
Contact no: 022-62647888
Email: richard.desouza@secur.co.in