

C-Quel Management Services Private Limited

Privacy and Cookies Notice

C-Quel ("We", "Us") is committed to protecting and respecting your privacy. This Privacy and Cookies Notice ("Notice") (together with and any other documents referred to therein) sets out the basis on which the personal data collected from you, or that you provide to Us will be processed by Us when you use our website at www.cquel.com ("Website") or any of our services, or where we enter into any other business relationship with you. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation ("GDPR", from the GDPR implementation date) the Data Controller is C-Quel

YOUR PERSONAL INFORMATION

Information we collect from you

We collect and process some or all of the following types of information from you in the course of your use of the Website, our provision of our services, or otherwise conducting any business relationship with you:

- Information that you provide by filling in forms on the Website. This includes information provided at the time of registering to use the Website, subscribing to our services (including but not limited to news alerts), or requesting further information or services. We may also ask you for information when you complete a survey or enter contests.
- Specifically, personal details such as name, email address, place of work, position, country, telephone number or any information input by you when using the Website, completing our survey forms or using our services.
- In respect of the personnel engaged by our customers and suppliers (or prospective customers and suppliers), and with whom We come into contact in connection with the relationship between Us and our customer and supplier, We will process your contact details and any other information that you provide to Us.
- If you contact Us, We may keep a record of that correspondence.
- We may also ask you to complete surveys that We use for research purposes, although you do not have to respond to them.
- Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.

The provision of name, email address, place of work, position, country and telephone number is required from you to register to use the Website. Your name and email address are required from you to register for news alerts. We will inform you at the point of collecting information from you, whether you are required to provide the information to Us.

Information We Collect From Other Sources

We use public sources such as Google search, to obtain the contact details of individuals who we reasonably believe may have an interest in our products and services.

C-Quel's own use of your personal data

We use information held about you in accordance with the following "legal bases" and for the following purposes:

- To provide you with our Website and associated functionality (such as password reminders) and to carry out any other obligations arising from any contracts entered into between you and Us. We rely on "performance of a contract with you" as the legal basis for this processing.
- To provide you with news alerts. We rely on "consent" as the legal basis for this processing.
- To notify you about changes to our service. We rely on "performance of a contract with you" as the legal basis for this processing.
- To ensure that content on the Website is presented in the most effective manner for you and for the device(s) you use to access and view the Website. We rely on "legitimate interest" as the legal basis for this processing, and the legitimate interest is the maintenance and improvement of our Website for the benefit of all our users.
- To allow you to participate in interactive features of our service, when you choose to do so.

In any case, if you would prefer that we do not use your data to market or promote our products and services to you, please either (i) tick the relevant box on the form through which We collect your data (for example, the registration form); (ii) unsubscribe from our electronic communications using the method indicated in the relevant communication; or (iii) contact Us at the contact details set out below.

STORING YOUR PERSONAL DATA

Security

We take appropriate measures to ensure that any personal data are kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms of use and that we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any personal data to these websites.

Keeping your personal data up to date

If your personal details change you may update them by accessing the relevant page of the Website, or by contacting Us at itsupport@cquel.com. If you have any questions about how We use data collected which relates to you, please contact Us by emailing itsupport@cquel.com

We will endeavour to update your personal data within seven (7) working days of any new or updated personal data being provided to Us, in order to ensure that the personal data We hold about you is as accurate and up to date as possible.

How long we keep your personal data

- For Website Users will hold your personal data as per timelines defined under agreement, upon termination of contract or upon request Us to delete it.

Where we store your personal data

All information We hold about you is stored on our secure servers within the premises of C-Quel.

YOUR RIGHTS

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Notice is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances

If you would like to exercise any of those rights, please:

- email, call or write to Us,
- let Us have enough information to identify you [(eg account number, user name, registration details)],
- let Us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let Us know the information to which your request relates [, including any account or reference numbers, if you have them]

CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify this Notice at any time. Any changes We may make to our Notice in the future will be notified and made available to you using the Website. Your continued use of the services and the Website shall be deemed your acceptance of the varied Privacy Notice.

INFORMATION ABOUT OUR USE OF COOKIES AND IP ADDRESSES

We may collect information about your mobile phone, computer or other device from which you access the Website including where available [your IP address, operating system and browser type], for systems administration [and to report aggregate information to third parties affiliates]. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We may, however, use such information in conjunction with the data We have about you in order to track your usage of our services.

Our Website uses cookies to distinguish you from other users of our Website. This helps Us to provide you with a good experience when you browse our Website and also allows Us to improve the Website. By using our Website you agree to our use of cookies as more specifically set out below.

A cookie is a small file of letters and numbers that We store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

The cookies We use include:

- **“Analytical”** cookies. They allow Us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps Us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
- **“Strictly necessary”** cookies. These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.
- **“Functionality”** cookies. These are used to recognise you when you return to our Website. This enables Us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **“Targeting”** cookies. These cookies record your visit to our Website, the pages you have visited and the links you have followed to our affiliates websites. We will use this information to make our Website, offers e-mailed to you and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties affiliates may also use cookies, over which We have no control.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential 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 our Website.

CONTACT

All questions, comments and requests [except where specified above] regarding this Privacy and Cookies Notice should be addressed to itsupport@cquel.com or write to Us at:-

C-Quel Management Services Pvt Ltd
PS Srijan Corporate Park
Unit 1308
Sector EP&GP, Sector V, Salt Lake
Kolkata 700091, India

