

1st August 2018

PRIVACY NOTICE FOR PRIMARY MARKET RESEARCH (PMR)

INTRODUCTION

Netscribes (India) Private Limited is committed to keeping your personal data private. We shall process any personal data we collect from you in accordance with the Data Protection Legislation and the provisions of this Privacy Notice. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

COLLECTING INFORMATION FROM YOU

Netscribes (India) Private Limited will collect and process information/opinion that may consist of your personal data you provide us through application forms, our website, and face-to-face and electronic communication (including telephone conversations) in order to provide our services.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

We may collect, store, and use the following categories of personal data about you:

- Contact details such as name, job title, telephone numbers, and email addresses
- Information we obtain from third parties, such as information that we obtain when verifying the details provided by you and information collected from business networking sites and other third parties

For selected projects, we may collect the information mentioned below:

- IP addresses (only for validation purposes)
- Age (month and year) for selected projects (only after prior notifications)
- Gender
- Employment status and salary range
- Cookies

LAWFUL GROUNDS FOR USING YOUR INFORMATION

We are permitted to process the information we collect from you, which may consist of your personal data, in compliance with the Data Protection Legislation by relying on one or more of the following lawful grounds:

- The processing is necessary for the purpose of a legitimate interest pursued by us
- You have explicitly agreed to us processing such information for a specific reason

- The processing is necessary to execute the agreement we have with you/controllers or to take steps to enter into an agreement with you/controllers

PURPOSES OF PROCESSING

Any Personal Information submitted to us, together with any other information, material, or content you have provided (collectively hereinafter referred to as "**Data**"), shall be used for primary research purposes or for the purposes to which they were submitted or required.

1. Information we process because we have a contractual obligation with you/controller

In order to carry out our obligations under a contract with a controller or yourself, we must process the information given to us under the guidelines issued by you/controller. Some of this information may be personal information.

Additionally, we aggregate this information in a general way and use it to provide class information, for instance, to collect opinions/suggestions and to conduct polls. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us and the controller ends or is terminated by either party under the terms of the contract.

2. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or access our survey sites, you provide your consent to us to process information that may be personal information. Wherever possible, we aim to obtain your explicit consent to process this information.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information.

We will continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at privacy@netscribes.com.

Information we process because of legitimate interest

When we process your personal information for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests — we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

DETAILS OF DATA TRANSFERS OUTSIDE THE EU

We operate globally and may transfer your personal information to our affiliate companies or third parties in locations around the world for the purposes described in this privacy policy. Wherever your personal information is transferred, stored, or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. Additionally, when using or disclosing personal information transferred from the European Union, we use standard contract clauses approved by the European Commission, adopt other means under European Union law for ensuring adequate safeguards, or obtain your consent.

If we transfer your information outside the European Economic Area under other circumstances, we will use best endeavours to put in place appropriate safeguards to ensure that your personal information remains adequately protected.

RETENTION AND DISPOSAL OF DATA AND OUTPUT

We will store the information we collect about you on our systems or with third parties only for as long as required for the purposes set out above or as required to comply with any legal obligations or contract conditions to which we are subject. We will regularly review our files to check that the information is accurate, up to date, and still required.

We will normally destroy or erase data after statutory timelines lapse. However, we may retain your information after you cease to be a customer for longer than this, provided it is necessary for legal, regulatory, fraud prevention, or other legitimate business purpose.

STORAGE OF YOUR PERSONAL DATA AND DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, ; altered; or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will process your personal data on our instructions only and they are subject to a duty of confidentiality.

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

RIGHTS OVER YOUR PERSONAL DATA

Under certain circumstances, provided by law you have the right to:

- Be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from which it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance, and envisaged consequences).
- Object to your personal data being processed for a particular purpose or to request that we stop using your information.
- Request not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.

- Ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible and otherwise required by applicable regulations.
- Withdraw, at any time, any consent that you have previously given to us for our use of your personal data.
- Ask us to stop or start sending you surveys at any time.
- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. It is important that the personal data we hold about you is accurate and current. Please keep us informed about any change in your personal data during your working relationship with us.
- Request the erasure of your personal data. This enables you to ask us to delete or remove personal data where you think that we do not have the right to process it.

Any request for access to or a copy of your personal data must be in writing, and we will endeavour to respond within a reasonable period (within one month, in any event), in compliance with the Data Protection Legislation. We will provide this information free of charge, unless the request is manifestly unfounded or excessive. We will comply with our legal obligations as regards any individual's rights as a data subject.

CONTACT US

- We are Netscribes (India) Private Limited, 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, at privacy@netscribes.com; (c) by telephone, using the contact number published on our website from time to time; and (d) through our website, by using our website contact form, available at <https://www.netscribes.com/contact/>.

Details of the Data Protection Officer

Souvik Banerjee
Data Protection Officer
Netscribes (India) Private Limited
India
Email: DPO@netscribes.com

NOTIFICATION OF CHANGES

If we decide to change our privacy policy, we will post those changes on this page so our users are always aware of the information we collect and how we use it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.

Where links are provided to other websites, it should be noted that they are not and cannot be governed by our Privacy Statement. We cannot guarantee your privacy when you access other websites through any link provided on this website.