

## **PRIVACY POLICY**

Sparzana which shall mean and fully committed to protecting your personal information. Protecting your privacy is important to us, and we are committed to handling your information with care and in compliance with applicable data protection laws. We take the privacy of your information seriously. This Privacy Policy ("Policy") only applies to information collected through this Website and not to any information collected offline.

This Policy applies to the main website "<https://gama.refex.group/>". Which is designed to help you understand how we collect, use, disclose, and safeguard your personal information when you access and use the Application.

### **1. DEFINITIONS**

In this Policy the following definitions are used:

- i. **"Data"** includes information that you submit to Sparzana via the Website and information that is accessed by Sparzana pursuant to your visit to the Website except for your information that is or will be in the public domain.
- ii. **"Data Protection Laws"** any applicable law relating to the processing of personal Data, including the Information Technology Act, 2000, as amended or substituted;
- iii. **"User or you"** the natural person who accesses the Website
- iv. **"Website"** is the website that you are currently using, "<https://gama.refex.group/>" and any sub-domains of this site, unless excluded by their own terms.

### **2. SCOPE**

GAMA Airops collects some of the Data directly, such as when you submit an entry (through the general query, or submission of a proposal). You can visit , <https://sparzana.com/>, without telling Sparzana who you are.

### **3. APPLICABILITY**

The Website is intended for all persons who are interested in learning about Sparzana and seeking opportunities and knowledge related to Sparzana.

### **4. DATA COLLECTION**

- i. We collect Data (including name and email address) that you voluntarily provide to Sparzana when you express an interest in our services by submitting any information as may be requested on the Website. We donot track, collect or store any information automatically which includes IP address, browser type, browser cookies, location and device information.
- ii. We keep your Data/information for as long as necessary to fulfil the purposes outlined in this Policy unless otherwise required by law.

- iii. We collect Data when the Data is given to us by you; and
- iv. We do not automatically capture any specific personal information from you, (like name, phone number or e-mail address), that allows us to identify you individually. If the Website requests you to provide personal information, you will be informed of the particular purposes for which the information is gathered and adequate security measures will be taken to protect your personal information.
- v. Any of your information/data available in the public domain shall not be protected under the purview of this Policy and Sparzana shall not be held liable for any such disclosures.

## **5. DATA USAGE**

By entering your User Information, you accept that Sparzana may retain your Data and that it may be held by Sparzana. We, shall be entitled to use your Data/Personal Information for the following purposes:

- vi. Provide and communicate with you about feedback, and follow up on queries submitted to us.
- vii. Fulfil your requests regarding the services, including without limitation responding to your inquiries, and communicating with you about Our products or services that We believe may be of interest to you.
- viii. Enforce the legal terms (including without limitation our policies and terms of service) that govern your use of our Services, and/or for the purposes for which you provided the Information,
- ix. Prevent fraud or potentially illegal activities (including, without limitation, copyright infringement) on or through Our Website or Services,
- x. In order to enable Sparzana to comply with any requirements imposed on Sparzana by law.

## **6. DATA SHARING & DISCLOSURE**

We may share your personal data with:

- i. Internal Business/ Functional team to reach out to you in relation to their programs or campaigns (including marketing and sales) and to process your query/requests;
- ii. Our employees working on our behalf for the purposes described in this Policy.

We usually do not share other personal Data collected from the Website with other third parties. However, this may happen if:

- i. You request or authorize us to do so;
- ii. We need to comply with applicable law or respond to valid legal processes.

## **7. DATA SAFETY**

We are committed to your privacy and security, we have implemented appropriate technical and organizational security measures to attempt to safeguard and help prevent unauthorized access, maintain data security and correctly use the information we collect online through the Website. You agree that no security measures are perfect or impenetrable and we cannot ensure or warrant the security of any information you transmit or provide to us through the site and we shall not be held liable for any unveiling or disclosure.

## **8. POLICY CHANGES**

Sparzana reserves the right to change this, Policy. When any changes are made to the Policy, we will post the current version on our website. We encourage you to periodically review this Policy so that you will be aware of our updated privacy practices.

Your continued use of the site after these modifications will constitute your:

- Acknowledgement of the modified Policy
- Agreement to abide and be bound by the Policy.

## **9. ACCEPTANCE OF THE POLICY**

By visiting our website and uploading information on our website; you acknowledge and unconditionally accept the Policy. If you do not agree with this policy, do not use our website and services or provide here any of your personal data.

## **10. RETENTION OF DATA**

Sparzana retains Data for as long as necessary to provide the access to and use of the Website, or for other essential purposes such as complying with our legal obligations, resolving disputes and enforcing our agreements. Because these needs can vary for different data types and purposes, actual retention periods can vary significantly. Even if we delete your Data, it may persist on backup or archival media for audit, legal, tax or regulatory purposes.

## **11. GENERAL**

If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

***Last update: 16 November, 2022***