# **Privacy Policy**

This Privacy Policy explains how Project Leaders Magazine operated by BizLink Media Group, a division of Denkoit Softech Pvt. Ltd. (a company registered in India under number U93030TG2017PTC119844), collects and uses your personal data. Throughout this policy, "we," "us," and "our" refer to Project Leaders Magazine, BizLink Media Group and Denkoit Softech Pvt. Ltd. We may also include other affiliated entities within our group. At Denkoit, we value your privacy and take data protection seriously. We strive to earn your trust by upholding strict standards for handling your personal information.

This policy explains how we collect, use, disclose, and handle your personal data. It also details your privacy rights and legal protections. If you have any questions about our data practices, please contact us using the information below.

We reserve the right to update this Privacy Policy at any time.

For more information about our data practices, please contact us at info@denkoit.com

This Privacy Policy outlines how we handle your personal information.

Here's a breakdown of key topics:

- 1. **Important Information:** This section provides crucial details about this policy.
- 2. **Data Protection Principles:** We explain the core principles guiding our data collection practices.
- 3. Collecting Your Information: Learn how we gather information about you.
- 4. **Information Collected and Use:** We detail the specific types of information collected and how we utilize it.
- 5. **Sharing Your Data:** We outline when and with whom we may share your personal information.
- 6. **International Transfers:** We explain how your data might be transferred internationally (if applicable).
- 7. **Data Security:** We detail the measures taken to safeguard your information.
- 8. **Data Retention:** We explain how long we retain your information.
- 9. Your Rights: Learn about your legal rights regarding your personal information.
- 10. **Glossary:** A reference section defining key terms used in this policy, such as "personal data" and "personal information."

# 1. Important Information

This Privacy Policy explains how Denkoit, or its associated groups or divisions collects and uses your personal data when you interact with us through various channels, including email, phone, social media, our websites (including any branded websites), and through subscriptions, registrations, surveys, or other forms of contact.

This policy applies to adults only. We do not knowingly collect data from children.

Please read this policy alongside any additional privacy notices you encounter when we collect your data. This policy supplements, not replaces, those specific notices.

For any questions about this Privacy Policy or your data rights (see section below), contact legal@denkoit.com

This policy was last updated on April 4, 2024. We regularly review and may update this policy. Please revisit for the latest version. We can also provide paper copies upon request.

We strive to maintain accurate and up-to-date personal information. Please inform us of any changes to your data during our interactions.

This website may contain links to websites, plug-ins, and applications operated by other companies (third parties). Clicking on these links or enabling these connections may allow third parties to collect or share information about you. We have no control over these third-party sites and are not responsible for their privacy practices.

Before leaving our website, we recommend you review the privacy policy of any third-party site you visit. This ensures you understand how your data may be used by those parties.

# **Data Protection Principles**

At Denkoit, or its associated groups or divisions, we take protecting your personal data seriously. We comply with data protection legislation when handling your information. These principles ensure your data is:

- Used fairly, lawfully, and transparently: We'll always be upfront about how we collect and use your data.
- Collected for specific purposes only: We won't collect your data unless we have a clear and legitimate reason.
- Minimal and relevant: We'll only collect the data we need for the specific purpose.
- Accurate and kept up to date: We'll take steps to ensure your data is accurate and reflects any changes.
- **Securely stored:** We'll implement appropriate safeguards to protect your data from unauthorized access, loss, or damage.
- **Not transferred without safeguards:** If we transfer your data internationally, we'll ensure adequate protection measures are in place.
- Accessible and controllable by you: You have the right to access your data and exercise certain rights related to it (explained further below).

## **Our Responsibility and Accountability**

We are responsible for complying with these data protection principles and can demonstrate our adherence to them.

#### **How We Collect Your Information**

We collect various types of personal data about you in several ways:

- **Direct Interactions:** When you register on our website, subscribe to newsletters, request services, respond to surveys, contact us, or submit inquiries.
- **Automated Technologies:** We may collect data through cookies (see our Cookies Policy for details) and website analytics tools.
- **Third-Party Sources:** We may receive data from partners, social media profiles, or businesses/subcontractors we work with, provided they have your consent or a legal basis to share it.

• **Publicly Available Information:** We may collect publicly available information about businesses relevant to our reports and digital media.

In some cases, we need your personal data to fulfill legal requirements or deliver the services you've requested through a contract. If this information is missing, we might be unable to provide those services. We'll always notify you beforehand if this situation arises and could lead to us terminating the contract.

#### What Information We Collect

We collect personal data to provide you with our services and improve your experience. This may include:

- **Contact details:** Name, address, phone number, email, account login details (if applicable), and social media details (if provided).
- **Payment information:** Credit/debit card details and bank account details (only if required for a specific transaction).
- **Interaction history:** Records of your communication with us (phone calls, emails, social media messages, etc.).
- Subscription history: Information about newsletters or publications you've subscribed to.
- **Profile information:** Photos you upload during signup (optional).
- Marketing preferences: Your choices about receiving marketing communications.
- **Technical data:** Information about your device and browsing activity (IP address, browser type, location, etc.). This helps us improve website functionality.

We also use anonymized data for statistical and analytical purposes. This "aggregated data" doesn't identify you directly and helps us understand how people use our website (e.g., percentage of users accessing a specific feature). If we combine anonymized data with your personal data in a way that identifies you, we'll treat it as personal data subject to this privacy policy.

We will never collect or process sensitive personal data (as defined in our Glossary) about you without your explicit consent.

## We will generally use your personal data to:

- Provide you with the information and services that you request from us;
- Provide you with access to our relevant newsletters and publications;
- Personalize your experience on our website and the websites of our brands;
- Contact you by post, e-mail, telephone and via social media regarding the services and information that you have requested from us;
- Process any financial transactions (including collection of payments, management of any additional charges and fees and administration of any refunds):
- Create and administer your account on our website and the websites of our brands:
- Generally administer our relationship with you:
- Respond to any enquiries that you submit to us;
- Send you information by post or email about new services, products, assets, offers, updates and news or those of our third party clients or partners (see the "Marketing" section below for further details), including opportunities to be involved in any of our publications;
- Comply with our legal and regulatory obligations:
- Keep a record of your relationship with us;
- Prevent and detect fraud;

- Provide customer service and support (including investigating complaints);
- Train our staff and carry out quality control;
- Review and improve our services and publications;
- Use data analytics to improve our website, marketing, customer relationships, user experience and our organisation in general; and
- Administer and protect the website and our organisation (including troubleshooting, data analysis, testing and system maintenance and network security).

## Why We Use Your Information

We use your personal information only when we have a legal reason to do so. Here are the main reasons:

- Your Consent: In some cases, you'll give us your explicit consent to use your information for a specific purpose, like subscribing to a newsletter.
- **Fulfilling a Contract:** We may use your data to deliver services you've requested, like providing reports you've purchased.
- Legitimate Interests: We may also use your information for our legitimate business interests, but only when these interests don't conflict with your privacy rights. This could include using your data to improve our website or services, prevent fraud, or provide you with relevant offers. We balance these interests carefully and won't use your data if the impact on your privacy is too great.

## **Marketing Communications**

We use your contact details to send marketing messages only when you've explicitly agreed to receive them (consumers) or haven't opted out (businesses and others who have requested information, subscribed, or provided contact details through a third party).

You can easily unsubscribe from marketing messages at any time by contacting us or clicking the "unsubscribe" button in an email. Please note that opting out won't affect information related to existing service agreements.

#### **Change of Purpose**

We typically use your personal data only for the reasons we originally collected it. However, there may be situations where we need to use it for a different but compatible purpose. For example, using your contact details to send you relevant information about our services, even if you initially signed up for a newsletter.

If the new purpose is unrelated to the original reason, we'll clearly explain this to you and outline the legal justification that allows us to do so.

In some rare cases, the law may permit us to use your data without your knowledge or consent. We'll only do this in strict accordance with legal requirements.

#### Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in paragraph 4 above.

- Any of our third party clients or partners for the purposes of lead generation, where
  you have given us consent to disclose your personal information or where we have
  a legitimate reason to do so.
- Any suppliers, sub-contractors and/or agents we work with to provide you with the services that you have subscribed to or otherwise purchased from us.
- Any designers who are involved in the creation or design of any of our publications.
- Service and infrastructure providers who provide IT, security, software, marketing, advertising and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, experts, accountants, insurers and other third parties who provide legal, banking, consultancy, accounting, insurance and other related services.
- HM Revenue & Customs, law enforcement agencies, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses, carry out a restructure or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.
- Any other entities in the BizLink group that may subsist from time to time.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We provide third-party advertising companies with Aggregated Data so that you may receive tailored advertisements based on your visits to our website and the websites of our brands. However, we do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not and will not sell your personal data to any third party.

### **International Transfers**

Since some of our third-party service providers or partners might operate outside India, your personal data may be transferred internationally during processing. Whenever this happens, we ensure a similar level of protection as mandated by the Indian data protection laws. Here's how we achieve this:

- Transfer to Approved Countries: We only transfer data to countries deemed to have adequate data protection safeguards by the Indian government.
- Standard Contractual Clauses: We utilize specific contracts approved by the Indian authorities that guarantee your data receives the same level of protection it has in India.
- Consent: In some cases, we may seek your explicit consent before transferring your data outside India.

We can provide more details on the specific mechanisms used for international data transfers upon request.

## **Data Security**

We take data security seriously and have implemented robust security measures to prevent:

• Accidental loss of your personal data.

• Unauthorized access, use, alteration, or disclosure of your data.

These measures involve:

- Restricting access to your data to authorized personnel with a legitimate business need
- Requiring all personnel handling your data to follow strict confidentiality protocols.
- Having procedures in place to identify and address any potential data breaches.
- Notifying you and the relevant authorities of a data breach (if legally required).

#### **Data retention**

We will only keep your personal data for as long as it's needed to fulfill the reason, we collected it. This includes any legal, accounting, or reporting requirements.

We consider several factors to determine the appropriate retention period for your data, such as:

- The type of data and its sensitivity
- Legal requirements
- The risk of unauthorized access or misuse

If you'd like to know more about how long we store specific types of data, please contact us.

## **Your Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please go to the below headings to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

# Free Access, with Exceptions

Accessing your data is usually free. However, we may charge a reasonable fee if your request is:

- Clearly unfounded (meaning it has no basis)
- Repetitive (you've made similar requests recently)
- Excessive (demands a large amount of data or requires significant effort)

In these cases, we may also refuse your request.

### **Verification and Support**

To ensure your data security, we may ask for specific information to verify your identity before processing your request. We may also contact you for further details to expedite the process.

### **Response Timeframes**

We strive to respond to all valid requests within one month. Complex requests or multiple requests may take longer. We'll keep you informed in such cases.

#### **Disclaimer**

This Privacy Policy is intended to be accurate and up to date. However, if you believe there are any inaccuracies, please do not hesitate to contact us. We will use reasonable efforts to promptly correct any errors brought to our attention. Denkoit, or its associated groups or divisions such as BizLink Media or Project Leaders Magazine, reserves the right to amend this Privacy Policy at any time and without prior notice. We encourage you to review this Privacy Policy periodically for any changes. Your continued access to or use of our website or services after any revisions to this Privacy Policy shall be deemed your acceptance of those changes.

## **Limitation of Liability**

Denkoit, or its associated groups or divisions strives to maintain the accuracy of the information contained in this Privacy Policy. To the fullest extent permitted by applicable law, BizLink disclaims all warranties and representations, express or implied, with respect to such information, including but not limited to implied warranties of merchantability, fitness for a particular purpose, title and non-infringement.

In no event shall Denkoit, or its associated groups or divisions be liable for any direct, indirect, incidental, punitive, special or consequential damages arising out of or in any way connected with the use of this Privacy Policy, including but not limited to, technical inaccuracies or typographical errors, the use or misuse of the information provided, or any claim of a data subject that their rights have been breached.

Please note that this Privacy Policy is for informational purposes only and does not constitute legal advice.

### Glossary

"Personal data", or "personal information", means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

"Sensitive Personal Data" means information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and personal data relating to criminal offences and convictions.

## **LAWFUL BASIS**

"Legitimate interest" means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the privacy impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us. "Performance of contract" means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

"Comply with a legal or regulatory obligation" means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

#### YOUR LEGAL RIGHTS

You have the right to:

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 data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.