#### **COOKIE POLICY**

We use "cookies" to help improve your browsing experience of our website. This Cookie Policy should be read in conjunction with our Website Privacy Notice.

#### **INFORMATION ABOUT OUR USE OF COOKIES**

Our site uses cookies and other similar technology to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. A 'cookie' is a small data file that is placed on your computer or mobile device ("device"). It allows a website to remember your actions or preferences until the cookie is deleted or expires. Some of the cookies we use are essential for our website to work. Our "website" includes this website, all our associated sites and our social media pages. We also use some non-essential cookies to collect information to help us improve the website.

We use cookies on this website to help you navigate our website efficiently, perform certain functions and to collect site statistics. These cookies do not store any personal information that would, on its own, allow us to identify individual users of this service without your permission.

We use a number of third party suppliers who also set cookies this websites on our behalf in order to deliver the services that they are providing. If you would like more information about the cookies used by these suppliers, as well as information on how to opt-out, please see the information in the tables provided below.

Please be aware that restricting cookies may impact on the functionality of the website and could mean that key features do not work properly. We strongly recommend allowing cookies from this website so that we can provide you with a full service.

To help you make an informed decision, we have categorised the cookies used on this site into two categories:

**Necessary cookies** – these cookies are fundamental to ensure the site works correctly.

**Optional cookies** – These cookies could help us track how you use the website so that we can improve the information and experience provided to you. They may also provide additional features by third party providers to allow you to socially share content or comment on this website.

The cookies used on this site are explained in the tables below.

### **NECESSARY COOKIES**

| Provider   | Cookie                | Expir<br>es        | Description / Purpose  |
|------------|-----------------------|--------------------|--|
| SPEC-India | ASP.NET_Sessi<br>onId | End<br>of<br>sessi | This session cookie is used to store anonymous details about the pages visited by you on this website and is |

|            |               | on    | required to provide this functionality to you. If you do not allow this cookie this website will not work correctly.                                     |
|------------|---------------|-------|--|
| SPEC-India | AcceptCookies | Never | This cookie that tells us that you have accepted cookies from this site and allows us to stop showing you the same message each time you visit the site. |

# **OPTIONAL COOKIES**

| Provid<br>er            | Description / Purpose  |
|-------------------------|--|
| Google<br>Analyti<br>cs | These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. We use this plug-in to allow us to provide a better user experience to you and only use it on the basis that Google adheres to its own privacy policy.  View the Google privacy policy |

### **ADDITIONAL INFORMATION GATHERED**

The information we collect may include some personal data. Our use of necessary cookies involves processing the following personal data:

- your IP address
- your approximate location based on your IP address at the time you are browsing

The lawful basis for processing of personal data relating to necessary cookies is our legitimate interests in administering and securing our website, making it available to you and understanding the needs of our website visitors.

Other (optional) cookies process the following personal data:

- the date, time and duration of visits
- · the number of pages viewed
- the amount of time spent on the website
- your device information
- your IP address

The lawful basis for processing of personal data relating to optional cookies is your opt-in consent which you grant when you click I accept on our website cookie banner.

## **HOW TO CONTROL AND DELETE COOKIES**

We will not use cookies to collect personally identifiable information about you unless you are willing to provide it. However, if you wish to restrict or block the cookies which are set by this website, or indeed any other website, you can do this through your browser settings. The help function within your browser should tell you how. You can also decline to consent to optional cookies (in which case, no optional cookies will be placed on your device).

You may wish to visit <u>www.aboutcookies.org</u> which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies.

To the extent that the use of cookies on our website involves the processing of personal data, please see our website privacy notice for details of your rights as well as other information relating to how we protect your personal data.

### DISCLOSURE OF YOUR INFORMATION

In addition to the 3rd parties referred to in the tables above, we may disclose personal data to:

- third parties, including cloud service providers, who provide a service to us
- a public authority in the event that we are required to do so by law
- a third party where we are under a legal obligation to transfer it to that third party or where we provide it on behalf of a client who is under such legal obligation
- a prospective seller or buyer of any of our assets or business
- a third party where it is necessary to protect the vital interests of the data subject or another natural person

To the limited extent that it is necessary to transfer personal data outside of the EEA, we will ensure appropriate safeguards are in place to protect the privacy and integrity of such personal data, including standard contractual clauses under Article 46.2 of the GDPR. Please contact us if you wish to obtain information concerning such safeguards (see Contact Us below).

# **DATA SUBJECT RIGHTS**

To the extent that we process personal data as a result of your cookie preferences and we are a controller of that personal data, you may request access to, rectification, or erasure of your personal data, or restriction of processing or object to processing of your personal data, as well as the right to data portability. In each case, these rights are subject to restrictions as laid down by law. The following is a summary of your rights:

- the right of access enables you to receive a copy of your personal data
- the right to rectification enables you to correct any inaccurate or incomplete personal data we hold about you

- the right to erasure enables you to ask us to delete your personal data in certain circumstances
- the right to restrict processing enables you to ask us to halt the processing of your personal data in certain circumstances
- the right to object enables you to object to us processing your personal data on the basis of our legitimate interests (or those of a third party)
- the right to data portability enables you to request us to transmit personal data that you have provided to us, to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party, where technically feasible

If you wish to exercise any of these rights, please contact us (see Contact Us below). We will respond to your request within one month. That period may be extended by two further months where necessary, taking into account the complexity and number of requests. We will inform you of any such extension within one month of receipt of your request. We may request proof of identification to verify your request. We have the right to refuse your request where there is a basis to do so in law, or if your request is manifestly unfounded or excessive, or to the extent necessary for important objectives of public interest.

In limited circumstances (such as our use of social media), we may act as a joint controller with another party. In such circumstances, upon your request to exercise any of the above rights we will advise you if there is another controller who you should contact. Please note that any other joint controller will also have its own privacy policy and cookie policy.

You have the right to lodge a complaint with the Irish Data Protection Commission (<a href="here">here</a>), if you consider that the processing of your personal data infringes the GDPR.

### **LINKS TO OTHER SITES**

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own cookie policies and we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal data to those websites.

## **SECURITY AND WHERE WE STORE YOUR PERSONAL DATA**

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We have implemented strict internal guidelines to ensure that your privacy is safeguarded at every level of our organisation. We will continue to revise policies and implement additional security features as new technologies become available. Where we have given you a password which enables you to

access certain parts of our website, you are responsible for keeping that password confidential. We ask you not to share your password with anyone.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our website. Any transmission of personal data is at your own risk. Once we receive your personal data, we use appropriate security measures to seek to prevent unauthorised access or disclosure.

### MANAGING AND DISABLING COOKIES

You can adjust your cookie settings through our website.

If you want to remove existing cookies from your device, you can do this using your browser options. If you want to block future cookies being placed on your device, you can (i) decline to consent to optional cookies; or (ii) adjust your browser settings. However, if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our site.

Most web browsers give you some control over cookies through the browser settings. However, turning cookies off may interfere with your browsing experience.

For instructions on how to manage and disable cookies, visit the browser developer's website. If you use more Devices and/or browsers you will need to disable cookies on each Device and on each browser separately.

Find out how to manage and disable cookies on popular browsers:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- Apple Safari

### **CHANGES TO THIS POLICY**

We reserve the right to change this Cookie Policy from time to time at our sole discretion. If we make any changes, we will post those changes here and update the "Last Updated" date at the bottom of this Cookie Policy. However, if we make material changes to this Cookie Policy we will notify you by means of a prominent notice on our website prior to the change becoming effective.

### **CONTACT US**

Questions, comments, requests and complaints regarding this Cookie Policy are welcome and should be addressed to nehil.mehta@spec-india.com or by writing to SPEC House, Swastik Char Rasta, Karnavati.addressed for the attention of Nehil Mehta. All requests will be dealt with promptly and efficiently.