Welcome to the privacy policy of Glazer Tec, a principal unit of Glazer Labs Private Limited. Registered under Indian law, our headquarters are located at Office No 601, 6th Floor Cube By Solaris, B/S Rajoo India, Rundh-Vesu, Piplod, Surat, Gujarat, India 395007. We are committed to protecting and respecting your privacy. This policy outlines how we manage your personal data when you interact with our services, irrespective of your location. It also details your rights and the legal protections available to you under applicable law.

This privacy policy is structured to provide you with easy navigation and understanding of our data handling practices:

1. **Important Information and Who We Are**
2. **The Data We Collect About You**
3. **How Your Personal Data Is Collected**
4. **How We Use Your Personal Data**
5. **Disclosures of Your Personal Data**
6. **International Transfers**
7. **Data Security**
8. **Data Retention**
9. **Your Legal Rights**
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**1. Important Information and Who We Are**

**Purpose of This Privacy Policy** This privacy policy is designed to inform you about how Glazer Tec handles your personal data when you interact with our platform. This includes any information you provide when you sign up for our newsletter, create an account, purchase our products or services, or participate in competitions or promotions.

Please note, our platform is not intended for children under the age of 16, and we do not knowingly collect data from children of this age group. If we become aware of such data collection, we will take steps to block the user and delete any related information promptly.

This policy serves as a supplement to other privacy or fair processing notices that may be provided on specific occasions when we collect personal data about you, ensuring that you understand how and why we use your data. This policy is intended to complement, not override, such notices.

**Controller** Glazer Tec is part of Glazer Labs Private Limited. This privacy policy is issued on behalf of Glazer Labs, so references to "Company," "we," "us," or "our" mean Glazer Labs Private Limited when it comes to processing your data. We identify the specific entity responsible for your data when you engage in transactions with us. Glazer Labs Private Limited oversees this platform.

**Contact Information** For any questions regarding this privacy policy or to exercise your legal rights, please contact our Legal Department:

* **Address:** Office No 601, 6th Floor Cube By Solaris, B/S Rajoo India, Rundh-Vesu, Piplod, Surat, Gujarat, India 395007
* **Email:** team@glazer.games

**Changes to the Privacy Policy and Your Duty to Inform Us of Changes** Our privacy policy is regularly reviewed and updated. Please ensure that the personal information we hold about you is accurate and up-to-date by notifying us of any changes during your relationship with us.

**Third-Party Links** Our platform may include links to third-party websites, plugins, and applications. When you click on these links or enable connections, third parties may collect or share data about you. We do not control these third-party websites and are not responsible for their privacy practices. We advise you to read the privacy policy of every website you visit after leaving our platform.

**2. The Data We Collect About You**

Personal data, or personal information, refers to any information about an individual that can be used to identify them. This does not include anonymous data where the identity has been removed.

We may collect, use, store, and transfer various types of personal data, which we categorize as follows:

* **Identity Data**: Includes first name, last name, maiden name, username or similar identifier, marital status, title, date of birth, and gender.
* **Contact Data**: Includes billing address, delivery address, email address, and telephone numbers.
* **Financial Data**: Includes bank account and payment card details.
* **Transaction Data**: Includes details of payments to and from you and records of products and services you have purchased from us.
* **Technical Data**: Includes internet protocol (IP) address, login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system, platform, and other technology details related to the devices you use to access our platform.
* **Profile Data**: Includes your username, password, purchase history, orders, interests, preferences, feedback, and survey responses.
* **Usage Data**: Includes information on how you use our platform, products, and services.
* **Marketing and Communications Data**: Includes your preferences for receiving marketing communications from us and third parties, as well as your communication preferences.

We also collect, use, and share **Aggregated Data**, such as statistical or demographic data, for analytical purposes. While Aggregated Data may be derived from personal data, it is not considered personal data under the law as it does not directly or indirectly identify you. For example, we may aggregate your Usage Data to determine the percentage of users accessing a specific platform feature. However, if we combine Aggregated Data with your personal data in a way that directly or indirectly identifies you, the combined data will be treated as personal data and handled in accordance with this privacy policy.

**Special Categories of Data**We do **not** collect any Special Categories of Personal Data. This includes details such as your race or ethnicity, religious or philosophical beliefs, sexual orientation, sex life, political opinions, trade union membership, health information, and genetic or biometric data. Additionally, we do not collect information about criminal convictions or offenses.

**If You Fail to Provide Personal Data**

In situations where we are required to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide the requested data, we may be unable to fulfill our obligations under the contract. For example, we may not be able to provide you with certain products or services.

If this happens, we may need to cancel a product or service you have requested or purchased. However, we will notify you of this at the time and provide any relevant details regarding the cancellation.

**3. How Is Your Personal Data Collected?**

We collect personal data about you through a variety of methods, including:

3.1. Direct Interactions

You may provide us with your **Identity, Contact, and Financial Data** by filling out forms or by corresponding with us via post, phone, email, or other means. This includes personal data you provide when you:

* Apply for or request our products or services;
* Create an account on our platform;
* Subscribe to our services, newsletters, or publications;
* Request marketing communications to be sent to you;
* Enter a competition, promotion, or survey; or
* Provide feedback or contact us.

3.2. Automated Technologies or Interactions

As you interact with our platform, we automatically collect **Technical Data** about your equipment, browsing actions, and usage patterns. This data is collected through:

* Cookies;
* Server logs;
* Other similar tracking technologies.

Additionally, we may receive **Technical Data** about you if you visit other websites that use our cookies. For more information, please refer to our **Cookie Policy** at [insert link to Cookie Policy].

3.3. Third Parties or Publicly Available Sources

We may receive personal data about you from various third parties and public sources, as outlined below:

1. **Technical Data** from the following third-party sources:
   * **Analytics providers** (e.g., Google Analytics);
   * **Advertising networks**;
   * **Search information providers**.
2. **Contact, Financial, and Transaction Data** from providers of payment, delivery, and technical services.
3. **Identity and Contact Data** from:
   * Data brokers or aggregators;
   * Publicly available sources (e.g., government databases, online directories).

**4. How We Use Your Personal Data**

We will only use your personal data when permitted by law. The most common scenarios where we process your personal data include:

1. **To Perform a Contract:**Where we need to process your data to fulfill a contract we are about to enter into or have already entered into with you. For example:
   * Providing you with products or services.
   * Managing payments, orders, or delivery of services.
2. **Legitimate Interests:**Where it is necessary for our legitimate business interests (or those of a third party), provided that your interests and fundamental rights do not override these. Legitimate interests may include:
   * Improving our platform, services, or customer experience.
   * Ensuring the security and functionality of our platform.
   * Conducting data analytics to enhance our business performance.
   * Sending updates, notifications, or communications related to the services you have purchased.
3. **To Comply with Legal Obligations:**Where we are legally required to collect, store, or share your personal data. For example:
   * Compliance with taxation, regulatory, or reporting requirements.
   * Responding to lawful requests from government or law enforcement authorities.

**Consent for Direct Marketing**While we generally do not rely on consent as the primary legal basis for processing your personal data, we will request your consent before sending you direct marketing communications from third parties via email, SMS, or similar means.

* You have the right to **withdraw your consent** for direct marketing at any time by contacting us at **team@glazer.games** or by following the opt-out instructions included in any marketing communication.

**Legal Basis for Processing**In summary, we rely on the following legal grounds for processing personal data:

* **Performance of a Contract**: To fulfill our obligations under a contract with you.
* **Legitimate Interests**: To support and improve our services and operations without compromising your rights.
* **Legal Obligation**: To comply with legal and regulatory requirements.
* **Consent**: Only where legally required, such as for third-party marketing.

Where required by law, we will always seek your explicit consent before processing your personal data. If we rely on consent and you later withdraw it, this will not affect the lawfulness of any processing carried out prior to the withdrawal.

If you have any questions about how we use your personal data, please contact us using the details provided in this Privacy Policy.

Purposes for Which We Will Use Your Personal Data

We have outlined below, in a table format, the specific purposes for which we use your personal data, the types of data involved, and the lawful basis we rely on, including where applicable, our legitimate business interests.

**Table: Purposes for Using Personal Data**

| **Purpose/Activity** | **Type of Data** | **Lawful Basis for Processing** |
| --- | --- | --- |
| **To register you as a new customer** | (a) Identity  (b) Contact | Performance of a contract with you |
| **To process and deliver your order, including:**  - Managing payments, fees, and charges  - Collecting and recovering money owed to us | (a) Identity  (b) Contact  (c) Financial  (d) Transaction  (e) Marketing and Communications | (a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts owed to us) |
| **To manage our relationship with you, including:**  - Notifying you about changes to terms or privacy policy  - Asking for feedback, reviews, or survey participation | (a) Identity  (b) Contact  (c) Profile  (d) Marketing and Communications | (a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Legitimate interests (to keep records updated and analyze service usage) |
| **To enable participation in prize draws, competitions, or surveys** | (a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications | (a) Performance of a contract with you  (b) Legitimate interests (to analyze usage and grow our business) |
| **To administer and protect our business and platform, including:**  - Troubleshooting  - Data analysis  - Testing and maintenance  - IT support  - Reporting and data hosting | (a) Identity  (b) Contact  (c) Technical | (a) Legitimate interests (to operate, secure, and optimize our business)  (b) Necessary to comply with legal obligations |
| **To deliver relevant platform content and advertisements, and measure the effectiveness of our ads** | (a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications  (f) Technical | Legitimate interests (to analyze service usage, grow our business, and inform our marketing strategies) |
| **To use data analytics to improve our platform, products/services, and customer experiences** | (a) Technical  (b) Usage | Legitimate interests (to analyze customer behaviors, update our platform, and develop business strategies) |
| **To make suggestions and recommendations to you about goods or services that may be of interest, including:**  - Booking a product demo  - Sending product or service information you have expressed interest in | (a) Identity  (b) Contact  (c) Technical  (d) Usage  (e) Profile  (f) Marketing and Communications | Legitimate interests (to promote relevant products/services and grow our business) |

Further Information

* We may rely on more than one lawful basis for processing your data, depending on the specific purpose for which we use it. If you need further details about the exact legal ground we rely on, please contact us at **team@glazer.games**.
* Where consent is required, such as for direct marketing communications, you have the right to withdraw it at any time.

Marketing

We strive to provide you with control over how your personal data is used for marketing and advertising purposes. Below are the mechanisms we have established for managing your preferences:

Promotional Offers from Us

We may use your **Identity**, **Contact**, **Technical**, **Usage**, and **Profile Data** to form a view of your preferences and interests. This enables us to identify and deliver products, services, or offers that may be relevant to you (referred to as “marketing”).

You will receive marketing communications from us if:

* You have requested information about our products or services; or
* You have purchased products or services from us, **and**
* You have not opted out of receiving such marketing communications.

Third-Party Marketing

We will seek your express **opt-in consent** before sharing your personal data with any third-party organization for marketing purposes.

Opting Out

You can ask us or any third party to stop sending you marketing messages at any time by:

* Clicking the **opt-out link** included in any marketing communication sent to you; or
* Sending an email to **team@glazer.games** requesting to opt-out.

**Note:** Opting out of marketing messages does not affect personal data that we process as a result of:

* A product or service purchase;
* Warranty registration;
* Feedback related to product/service experience; or
* Any other necessary transactions.

Cookies

Cookies are small text files that are placed on your device to enhance your experience on our platform.

* You can **disable cookies** through your browser settings (please refer to your browser’s “Help” section for instructions).
* If you disable or refuse cookies, some parts of the platform may become inaccessible or may not function properly.

For more details about how we use cookies and similar tracking technologies, please refer to our **Cookie Policy** at [Insert Link].

Change of Purpose

We will only use your personal data for the purposes for which it was originally collected unless we reasonably determine that we need to use it for another purpose **and** that purpose is compatible with the original one.

If you would like an explanation of how the processing for the new purpose is compatible with the original purpose, please contact us at **team@glazer.games**.

If we need to use your personal data for an **unrelated purpose**, we will:

1. Notify you of the new purpose; and
2. Explain the legal basis that allows us to process your data for this new purpose.

Please note: We may process your personal data **without your knowledge or consent** where this is required or permitted by law, provided that such processing complies with the rules outlined in this privacy policy.

5. Disclosures of Your Personal Data

We may share your personal data with the parties listed below for the purposes outlined in **Table B: Purposes for which we will use your personal data**:

1. Internal Third Parties

Internal third parties include other entities within **Glazer Labs Private Limited** that provide IT, system administration, or related services to support our business operations.

2. External Third Parties

We may share your personal data with the following types of external third parties:

* **Service Providers:** Third-party vendors, contractors, or partners who provide services such as:
  + IT and system administration services
  + Payment processing and delivery services
  + Marketing, advertising, and customer support services
* **Professional Advisors:** Lawyers, auditors, bankers, and other professional advisors acting in their professional capacities to provide legal, financial, or consulting services.
* **Regulators and Authorities:** Government agencies, regulatory authorities, or other organizations where disclosure is required to comply with legal or regulatory obligations.

3. Business Transfers

We may share your personal data with third parties as part of a **business restructuring**, which may include:

* Selling, transferring, or merging parts of our business or assets; or
* Acquiring or merging with other businesses.

If such changes occur, the new owners will be permitted to use your personal data in the same manner as stated in this Privacy Policy.

Third-Party Data Handling

We require all third parties to respect the security of your personal data and to process it in accordance with applicable laws and regulations.

* **Restrictions on Use:** We do not allow our third-party service providers to use your personal data for their own purposes.
* **Processing Scope:** They are only permitted to process your data for specified purposes, as per our instructions, and under strict confidentiality agreements.

4. Legal and Regulatory Requirements

We may disclose your personal information to third parties where:

* It is required by law, regulation, or court order;
* It is necessary to enforce or protect our legal rights, business operations, or the safety of our customers, employees, or others; or
* It is necessary to detect, prevent, or address fraud, security, or technical issues.

6. International Transfers

We may share your personal data within **Glazer Labs Private Limited** and its associated entities. This may involve transferring your data outside of **India** and, in some cases, outside your local jurisdiction.

Additionally, many of our **external third parties** are located in countries outside your region. As a result, the processing of your personal data by these parties may involve an international data transfer.

Safeguards for International Transfers

Whenever we transfer your personal data outside your country of residence, we ensure a **similar degree of protection** by implementing at least one of the following safeguards:

1. **Adequacy Decisions:**
   * We will only transfer your personal data to countries that have been deemed to provide an **adequate level of protection** for personal data. For example, countries recognized by the European Commission or other legal authorities as meeting data protection standards.
2. **Contractual Safeguards:**
   * Where we use **external service providers** or other third parties, we will put in place legally binding contracts that include **standard contractual clauses (SCCs)** approved by relevant regulatory authorities. These contracts ensure that your personal data receives the same level of protection it enjoys in your jurisdiction.
   * For example:
     + **European Commission’s Model Contracts** for transfers outside the European Economic Area (EEA).
     + For the UK, equivalent contractual safeguards tailored to UK laws and regulations.

7. Data Security

We take the security of your personal data seriously and have implemented appropriate technical and organizational measures to protect it from:

* Accidental loss;
* Unauthorized use, access, alteration, or disclosure; and
* Damage or destruction.

Our Security Measures

1. **Access Control:**
   * Access to your personal data is strictly limited to employees, agents, contractors, and other third parties who have a legitimate business need to access it.
   * Such individuals or entities will only process your personal data according to our instructions and are bound by a **duty of confidentiality**.
2. **Procedures for Breaches:**
   * We have robust procedures in place to identify, manage, and respond to any suspected **data breach**.
   * Where legally required, we will notify you and the relevant regulatory authority promptly if a breach occurs that may affect your personal data.
3. **Secure Storage and Encryption:**
   * All personal data you provide to us is stored on **secure servers**.
   * Any payment or financial transactions conducted through our platform are encrypted using **SSL (Secure Socket Layer)** technology or equivalent encryption standards to ensure the protection of sensitive data.

Your Role in Data Security

The security of your personal data also depends on your actions.

* If we provide you with a username and password to access certain sections of the platform, you are **responsible for keeping these credentials confidential**.
* Do not share your password with anyone, and be cautious when accessing accounts on shared or public devices.

**Public Spaces:**Please note that any personal data or content you share in public areas of the platform, such as forums, chats, or comment sections, may be visible to other users. We strongly encourage you to be mindful when sharing personal information in such spaces.

8. Data Retention

**How Long Will You Use My Personal Data For?**We will only retain your personal data for as long as necessary to fulfill the purposes for which it was collected, including:

* Meeting legal, regulatory, tax, accounting, or reporting obligations;
* Resolving disputes or complaints; and
* Protecting our legal interests where litigation is reasonably anticipated.

Retention Period Determination

To determine the appropriate retention period for your personal data, we consider the following factors:

1. **The Amount, Nature, and Sensitivity of the Data:**
   * The volume and type of data you provide and its relevance.
2. **Potential Risk of Harm:**
   * The risk of unauthorized access, use, or disclosure of your personal data.
3. **Purpose of Processing:**
   * Whether we can achieve the purposes of processing your personal data through other means.
4. **Legal and Regulatory Requirements:**
   * Obligations related to tax, accounting, and other applicable laws or regulations.

Longer Retention Periods

We may retain your personal data for an extended period in the following circumstances:

* If a complaint has been raised;
* If we reasonably believe litigation is likely in relation to our relationship with you; or
* Where legal or regulatory requirements mandate longer retention periods.

Deletion and Anonymisation

* In some circumstances, you have the right to request the **deletion of your personal data**. Please refer to the **"Your Legal Rights"** section for more details on how to exercise this right.
* When personal data is no longer necessary for the purposes it was collected, we may **anonymise** it. Anonymised data:
  + Is no longer considered personal data as it cannot be associated with you;
  + May be retained and used indefinitely for research, analytical, or statistical purposes without further notice to you.

9. Your Legal Rights

Under data protection laws, you have specific rights regarding your personal data. If you wish to exercise any of these rights, please contact us at **team@glazer.games**.

Your Rights

1. **Request Access to Your Personal Data**
   * You have the right to request a copy of the personal data we hold about you and to check that we are processing it lawfully.
2. **Request Correction of Your Personal Data**
   * You can request the correction of any incomplete or inaccurate data we hold about you. However, we may need to verify the accuracy of the new data you provide.
3. **Request Erasure of Your Personal Data**
   * You have the right to ask us to delete or remove your personal data where:
     + It is no longer necessary for the purposes for which it was collected;
     + You withdraw consent (where consent was the legal basis for processing); or
     + You successfully object to processing (see below).
   * Please note, we may not always be able to comply with this request for specific legal reasons, which will be communicated to you.
4. **Object to Processing of Your Personal Data**
   * You can object to the processing of your personal data where:
     + We are relying on **legitimate interest** as the legal basis, and you feel your rights and freedoms outweigh our legitimate interests; or
     + We are processing your data for **direct marketing** purposes.
5. **Request Restriction of Processing Your Personal Data**
   * You can ask us to suspend the processing of your personal data in the following scenarios:
     + You want us to verify the accuracy of the data.
     + Our use of the data is unlawful, but you do not want us to erase it.
     + You need us to retain the data even though we no longer require it because you need it to establish, exercise, or defend legal claims.
     + You have objected to processing, but we need to verify whether we have overriding legitimate grounds.
6. **Request Transfer of Your Personal Data**
   * You have the right to request a transfer of your personal data to yourself or a third party.
   * We will provide your personal data in a structured, commonly used, machine-readable format.
   * This right only applies to automated data for which you provided consent or where the data was necessary for the performance of a contract.
7. **Right to Withdraw Consent**
   * If we rely on consent to process your personal data, you have the right to withdraw your consent at any time.
   * This will not affect the lawfulness of processing carried out before you withdrew your consent.

No Fee Is Usually Required

You will not be charged a fee to access your personal data or exercise any of your other rights. However, we may charge a reasonable fee if:

* Your request is **clearly unfounded**, **repetitive**, or **excessive**; or
* We are legally permitted to refuse your request in such circumstances.

What We May Need From You

To confirm your identity and ensure that your personal data is not disclosed to unauthorized persons, we may request specific information from you. This is a security measure to protect your data.

* We may also contact you for further clarification or information to **speed up our response** to your request.

Time Limit to Respond

We aim to respond to all legitimate requests within **one month**. If your request is complex or you have made multiple requests, our response time may exceed one month. In this case, we will notify you and keep you updated on the progress of your request.

For any further queries or assistance regarding your rights, please contact us at **team@glazer.games**.

10. Glossary

**Lawful Basis**

* **Legitimate Interest**: This refers to our business interests in managing, operating, and improving our services to provide you with the best possible experience. Before processing your personal data based on legitimate interests, we ensure that we balance these interests against any potential impact on your rights and freedoms. We do not process your personal data for activities where our interests are overridden by your rights unless we have your consent or are legally permitted to do so. If you would like further details on how we assess legitimate interests, please contact us.
* **Performance of Contract**: This means processing your personal data where it is necessary to fulfill a contract we are about to enter into or have entered into with you. It also applies to taking steps at your request before finalizing a contract.
* **Comply with a Legal Obligation**: This refers to processing your personal data where it is necessary for us to comply with a legal or regulatory obligation we are subject to.

Third Parties

* **Internal Third Parties**: These include other companies within **Glazer Labs Private Limited** acting as joint controllers or processors. They provide IT and system administration services or assist with leadership reporting and management oversight.
* **External Third Parties**: External third parties include service providers who act as processors to deliver IT, payment processing, system administration, research, analytics, marketing, and customer support services. Additionally, professional advisers such as auditors, lawyers, bankers, and insurers may act as processors or joint controllers to provide legal, accounting, and consultancy services. Regulators and authorities, such as tax agencies or legal bodies, may also receive data when required by law.
* **Event and Contest Sponsors**: If you register for contests, promotions, or events hosted or co-hosted by us, we may share your data with sponsors. This includes data shared through event registrations or scanned badges at sponsor booths. Data shared in these instances will be subject to the sponsor’s privacy policies. You may opt out of this sharing when registering or through provided mechanisms.
* **Third-Party Networks**: Social media networks, advertising platforms, and other third-party networks may process your data to enable us to market and advertise our services across external platforms.
* **Corporate Transactions**: If we undergo a business restructuring, such as a merger, acquisition, sale, or dissolution, we may transfer your personal data to the new entity or third-party acquirers. In such cases, we will take reasonable steps to notify you of any transfer, as permitted by applicable laws.

We may also share **anonymous or de-identified data** for analysis, research, or to publicly show trends about how our services and products are used.

Your Legal Rights

Under data protection laws, you have the following rights:

1. **Request Access to Your Personal Data**: You have the right to receive a copy of the personal data we hold about you and verify that we are processing it lawfully.
2. **Request Correction of Your Personal Data**: You can ask us to correct any incomplete or inaccurate information we hold. We may verify the accuracy of the updated data you provide.
3. **Request Erasure of Your Personal Data**: You have the right to ask us to delete or remove personal data where there is no valid reason for us to retain it. This also applies when you successfully exercise your right to object to processing, when we have processed your data unlawfully, or when required by law. However, we may be unable to comply with erasure requests in specific cases, which we will explain at the time of your request.
4. **Object to Processing**: You can object to the processing of your data where we rely on legitimate interests and you believe this impacts your fundamental rights and freedoms. You may also object to processing for direct marketing purposes. In certain cases, we may demonstrate compelling legal grounds to continue processing your data.
5. **Request Restriction of Processing**: You can request the suspension of processing your personal data if:
   * You want us to verify the accuracy of the data.
   * Our use of the data is unlawful, but you prefer restriction over deletion.
   * You need us to retain the data to establish, exercise, or defend legal claims.
   * You have objected to processing, and we are verifying our legal grounds.
6. **Request Data Transfer**: You have the right to request that we transfer your personal data to you or a third party in a structured, commonly used, machine-readable format. This right only applies to automated data processing based on your consent or as part of a contract.
7. **Withdraw Consent**: Where we rely on consent to process your personal data, you can withdraw this consent at any time. However, withdrawing consent will not affect the lawfulness of processing conducted before its withdrawal. If withdrawing consent limits our ability to provide services, we will inform you at the time.