Template For Privacy Policy

1. Business Overview:

This Privacy Policy sets out how ABCD ("Company," "we," "us," or "our") processes personal data collected through its website located at ghdg@gmail.com and in connection with the provision of its services. We are committed to ensuring that the personal information of individuals who interact with our services is handled lawfully, fairly, and transparently.

This document explains the categories of personal data we collect, the purposes for which we process such data, and the rights individuals may exercise in relation to their personal information.

By using our services or accessing our website, individuals acknowledge that they have read and understood this Privacy Policy and agree to the collection, use, and disclosure of their personal data as described herein.

2. <u>Data Collection:</u>

We collect personal data and other information from individuals in a lawful, fair, and transparent manner when they access or use our services, interact with our website, or communicate with us. The types of personal data we may collect include, but are not limited to:

- Personal Identifiable Information (PII): such as names, email addresses, phone numbers, postal addresses, and other contact details.
- Technical and Usage Information: including IP addresses, browser types, operating systems, device identifiers, and details about how users interact with our website and services.

• Financial Information: where applicable, such as payment card details, billing addresses, or transaction history when individuals make purchases or financial transactions through our services.

• Health or Sensitive Information: only where explicitly provided by the individual and necessary for the provision of specific services, and always handled with additional safeguards where required.

The personal data we collect is limited to what is relevant and necessary for the purposes described in this Privacy Policy.

3. Direct Sources:

• <u>Directly collected:</u>

We collect personal data directly from individuals when they access our website, use our services, communicate with us, or otherwise voluntarily provide information. This may occur through account registrations, form submissions, surveys, transactions, customer support interactions, or other direct engagement with our services. All data collected directly is obtained with the individual's knowledge and, where required, with their appropriate consent.

4. <u>Legal Basis for Processing:</u>

We process personal data only when we have a valid legal basis to do so, as required by applicable data protection laws. Depending on the context and type of personal data involved, we may rely on one or more of the following lawful bases:

- **Consent:** We process personal data where individuals have provided their clear, informed, and unambiguous consent for a specific purpose. Consent can be withdrawn at any time, subject to applicable legal or contractual restrictions.
- **Performance of a Contract:** Processing is necessary for the performance of a contract to which the individual is a party, or to take steps at the individual's request before entering into a contract
- **Legitimate Interests:** We may process personal data where it is necessary for our legitimate business interests, provided that such interests are not overridden by the interests, rights, or freedoms of the

individuals concerned. These interests typically include business operations, service improvement, fraud prevention, and network security.

- **Vital Interests:** We may process personal data where it is necessary to protect an individual's vital interests, such as in emergency medical situations or other circumstances where the health and safety of an individual is at risk.
- **Public Interest:** We may process personal data where it is necessary to perform a task carried out in the public interest or in the exercise of official authority vested in us.

5. Third-Party Sharing:

We may share personal data with third parties, including service providers, business partners, and other trusted entities, for the purposes outlined in this Privacy Policy. These third parties may include, for example, payment processors, marketing partners, cloud service providers, and analytics providers. We ensure that any third-party processors we engage are bound by data protection agreements that require them to process personal data in accordance with applicable privacy laws and maintain adequate security measures.

Additionally, we may share personal data with third parties when required to do so by law or in response to valid legal requests, such as a subpoena or court order. We take reasonable steps to ensure that any such third-party sharing is in compliance with legal requirements and respects individual rights.

6. User Rights:

We provide individuals with certain rights regarding their personal data, in line with applicable data protection laws. The rights available to users may include the following:

• Individuals have the right to request access to the personal data we hold about them. This allows them to know what data is being processed, the purposes of the processing, and the recipients to whom the data has been disclosed. Upon request, we will provide a copy of the personal data in a structured, commonly used, and machine-readable format.
• Individuals have the right to request the deletion of their personal data under certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected, when consent is withdrawn (if consent was the basis for processing), or when the data has been processed unlawfully. We will assess each request on a case-by-case basis, in line with applicable laws, and will delete personal data when there is no legal or legitimate basis for retaining it.
• Individuals have the right to object to the processing of their personal data when we process it based on legitimate interests, direct marketing, or profiling. If you object to processing for direct marketing purposes, we will stop processing your data for those purposes immediately. If you object on other grounds, we will assess whether we have compelling legitimate grounds to continue processing the data.
International Transfers:
We may transfer personal data to countries or jurisdictions outside of the country in which it was originally collected, including to our service providers, business partners, or affiliates located in other regions. When we transfer personal data internationally, we

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ensure that appropriate safeguards are in place to protect the data in accordance with applicable privacy laws and this Privacy Policy.

Such safeguards may include:

- Ensuring that the receiving country offers an adequate level of data protection as determined by relevant authorities.
- Entering into data transfer agreements containing standard contractual clauses or equivalent legal mechanisms approved for cross-border data transfers.
- Implementing binding corporate rules or other legally recognized frameworks to govern the transfer and processing of personal data.
- Requiring third parties to maintain appropriate security measures and confidentiality obligations consistent with applicable legal requirements.

Where required, we will also obtain the individual's consent or provide clear notice regarding the transfer of their personal data to jurisdictions that may not offer the same level of protection.

8. Data Retention:

• We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, including to comply with legal, regulatory, contractual, or legitimate business requirements. The specific retention period for each category of personal data is determined based on the nature of the data, the purpose for its processing, and applicable legal obligations. Once the applicable retention period expires, we securely delete, anonymize, or archive the data in accordance with our data retention policy.

9. Security Measures:

We implement appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, misuse, or destruction. These measures are designed to ensure a level of security appropriate to the risk associated with the processing of personal data. Depending on the nature of the data and the processing activities, our security practices may include:

• **Access Controls:** Access to personal data is restricted to authorized personnel who require it to perform their job functions and are bound by confidentiality obligations.

Despite these measures, no method of data transmission or storage is entirely secure. We encourage individuals to exercise caution when sharing personal data and to notify us immediately if they become aware of any security concerns.

10. Contact Information:

If you have any questions, concerns, or complaints regarding this Privacy Policy or the way we handle your personal data, you may contact us using the details below. We have designated a contact point for privacy-related inquiries and requests, who can assist you with exercising your data protection rights or addressing any grievances.

Privacy Contact Details:

• Name: ANurag

• **Email:** bfdgfdgh@gmail.vom

• **Phone:** 54654767

• **Postal Address:** NOida

If you wish to raise a grievance regarding the processing of your personal data, you may also contact our designated grievance officer at the above details. We will make every effort to address and resolve your concerns promptly and in accordance with applicable legal requirements.