

Introduction

Your privacy is important to us and we believe it is important for you to know what personal data we, Visnet AI Technology Pvt Ltd (“VISNET” or “we”), collect from you (and third parties), why we collect it, how we use it and what rights you might be entitled to as a data subject or consumer.

Please note: all information in this privacy notice is applicable to you unless otherwise indicated based on your residency status. For the additional terms which may be applicable to you based on your residency status, please refer to your country-specific terms at the end of this notice. In this notice, the term “personal data” is used to represent any information relating to an identified or identifiable person; country-specific notices might adopt a different terminology.

We encourage you to read this notice, together with any additional and more specific information we may provide to you on various occasions when we are collecting or processing personal data on VISNET websites, products or applications, events, and initiatives so that you are aware of how and the purpose for which we are processing your personal data. (Please note: We issue a different privacy notice which applies where there is an employment relationship between VISNET and its employees.)

How we will use your personal data

We may collect different kinds of personal data in several different ways and use it for a number of different purposes:

To ensure access to our website and online services

In general, you can visit visnetai.co and its affiliate websites on the World Wide Web without telling us who you are. Our web servers or Affiliates who provide analytics and performance enhancement services may collect:

- IP addresses,
- operating system details,
- browsing details,
- device and connectivity details, and/or
- language settings

This information is aggregated to measure the number of visits, average time spent on the site, pages viewed, and similar information. VISNET uses this information to measure the site usage, improve content and to ensure safety and security as well as enhance performance and user experience of the website. In few situations, you are required to register to access an authenticated area of the website: in these cases, we will also collect your username and password. We may also obtain data from third parties including:

- Social networks, when you grant permission to us to access your data on one or more networks through our website.

- Service providers, who help us to determine a location based on your IP address in order to customize offerings and content to your location.

- Partners with whom we offer co-branded services or engage in joint marketing activities

VISNET uses cookies (small text files placed on your device) and similar technologies to facilitate proper functioning of our websites and to help collect data: please read here our [full cookie policy](#). Please note that our websites may include links to websites of third parties whose privacy practices differ from those of VISNET; if you provide personal data to any of those websites, your data is governed by their privacy statements.

To answer your queries, support and contact requests.

If you contact us with queries, requests for more information about initiatives or products or other generic support inquiries, we may need to process personal data about you such as:

- personal and contact details, like full name, company and role, email and address,
- demographic data,
- qualifications and profession, and/or
- the content of your messages to us.

For information about managing your contact data, email subscriptions and promotional communications, please use the contact us form on the visnetai.co or affiliate websites where you had given your Personal data.

Subscriptions to our promotional communications.

If you sign up to receive marketing communications from VISNET we may send these by email, post, telephone or any other means of communication. For information about managing your contact data, you may reach out to the contact details provided in the event privacy notice or in the emails you receive, or you may use the contact us form on the visnetai.co or affiliate websites where you had given your Personal data.

To administer events and initiatives.

VISNET frequently organizes events and initiatives, either free to join or by invitation only; in these cases, this privacy notice applies to both participants and speakers, together with any

other supplementary information that is provided in relation with each event. To allow participants to join the events (including communications pre and post event), we are required to collect and process a limited amount of information, such as

- full name,
- company, job title and business email address,
- telephone number,
- location, and/or
- pictures and video of you.

Where a hospitality service is provided, we may also collect, store and process “special categories” of more sensitive personal data (SPI), such as dietary requirements or personal disabilities. This will be done only and to the extent permitted by law. Events might be recorded, hence pictures and videos may be collected too; in such cases, you may be informed via a specific notice at the location of recording. This material may be used later by VISNET for further compatible purposes in accordance with the notices you receive. Also, during the course of the events, we may collect from you data about yourself, which we later may use to contact you again in order to receive feedback and/or provide further commercial information about VISNET; this may be done with your consent, wherever necessary. We may also obtain data from third parties including third-party event organizers where the event is sponsored by VISNET. Organizers might provide the attendee list. In such cases, the privacy statement of those third parties to whom you provide your personal data will apply to you.

To promote the VISNET brand, products, initiatives, and values with marketing communications.

VISNET has a strong legitimate interest in promoting its brand, products, initiatives, and values. In order to further such goals, we process personal data about our business contacts including existing and potential VISNET clients, third parties, and intermediaries VISNET interacts with within the course of doing business. VISNET may collect details about you including name, contact details, and other information such as your job title, employer, areas of business interest, and other business details. We may process such data using software or platforms which allow us to manage our client relationships. We collect such data directly or indirectly from you, or from third parties, such as business partners, data brokers, social networks, marketing companies, and publicly available sources such as social media sites where lawful to do so. In such cases, we will also comply with any additional restrictions imposed by the region in which your data was collected as well as the source of the data. VISNET may also collect data from our email and calendar systems concerning interactions between VISNET associates and contacts or third parties.

Your data is used by us in part for administering, managing, and developing our business and services; such as identifying existing and potential client business needs, analyzing and evaluating the strength of our interactions with certain business contacts, performing analytics including to produce metrics such as relationship maps for our business leadership and limited profiling for the purposes of helping us to develop and offer appropriate products and services to existing and potential clients. Analytics may be performed by us using algorithms which help us analyze and rank interactions with you depending on interaction frequency and duration. We may also send you marketing communications and surveys to carry out market research or provide information to you about us and our services which we have reason to believe would be of interest to you in your professional capacity.

When reaching out to you, we may do so through different channels, such as email, phone calls, post, or any other means of communication such as through social media sites such as LinkedIn. We will only send electronic marketing communications to business contacts in a business-to-business context, where we have your prior consent or where it is otherwise lawful to do so in the jurisdiction you are located in. You can opt-out from receiving such communications at any time using the contact us form on visnetai.co or affiliate websites where you had given your personal data, writing to our Data Protection Officers or Head – Global Privacy Office (see the section below) or by any other given method provided from time to time (for example: unsubscribe link included at the bottom of emails).

From time to time, we may use your name, quotes, pictures, or videos to promote and amplify VISNET's brand and activities. In any such case, you will receive appropriate additional information about the usage of your personal data.

To manage, administer and fulfill the obligations under contracts, and regulations

Where VISNET is in a contractual relationship with you (other than an employment relationship), your employer, or your company, or is taking steps to enter into such a contractual relationship, we may need to process your personal data, usually limited to name, business contact details and job title in order to enter into and/or fulfill the obligations arising from the same contract, such as providing you or your employer or company with the services you have requested or make use of the services that you or your employer or company are offering to us. We will also process such personal data for ancillary tasks related to our daily business activities, such as accounting, auditing, and reporting (to regulators and authorities) and to comply with applicable regulations.

If you do not provide certain information when requested, it may delay or prevent us from administering a service you have requested from us, or in replying to your queries and/or in letting you join our initiatives.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose and applicable law. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we will share your personal data

We may share your data with third parties, including third-party service providers and other entities in the VISNET. Please note, VISNET has not in the past, nor does it currently, under any circumstances sell your personal data to any third party. Further, VISNET does not share your personal data with third parties for any additional purpose (as outlined below) unless required to fulfill a legal obligation or a legitimate business purpose where permitted by law.

Why might you share my personal data with third parties?

We may share your personal data with third parties where required by law, where it is necessary for one of the activities mentioned above, or where we have another legitimate legal basis in doing so. We require third parties to respect the security of your data and to treat it in accordance with the law. Where required by the law, we will request your consent before transferring data to third parties which are not part of the VISNET.

Which third-party service providers process my personal data?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our company. The following activities may be carried out by third-party service providers: hosting and other internet services, data storage and analytics, marketing research and campaign management, and event organizers, and caterers. All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions and applicable law. We may also need to share your personal data with regulators or to otherwise comply with the law.

When might you share my personal data with other entities in the group

We may share your personal data with other entities in the VISNET group as part of our regular reporting activities on company performance, in the context of a business reorganization or group restructuring exercise, for system maintenance support and hosting of data and when it is required to do so in order to perform one of the activities listed above (see "How we will use information about you"). Other entities in the VISNET company are required to take appropriate security measures to protect your personal data in line with our policies.

Transferring your personal data outside of your country of residence

We may transfer the personal data we collect about you to one of more countries outside of your country of residence or outside of the country in which you access this website, including India, in order to perform one of the activities listed above (see "How we will use information about you"). – In such cases, we have put in place the appropriate measures to ensure that your personal data will be secure according to the laws of the country in which you reside. If you require further information about these protective measures, you can request it from our Data Protection Team (see contacts below) or send an email to team@visnetai.co.

How we will keep your information safe

We have put in place appropriate technical, organizational, and security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long we will keep your information

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal data are available in our retention policy upon request from our Data Protection Team (see contact details below). To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymize your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

How to contact us

If you have a privacy concern, complaint, or question regarding this privacy statement, please direct it to the Head – Global Privacy Office of Visnet AI Technology Pvt Ltd at team@visnetai.co or contact us through the “Contact us” form on visnetai.co or affiliate websites where you provided your Personal data indicating your concern in detail.

For the purposes of the data processed under this statement, the controller or business/service provider for the data processing of your personal data collected through our websites is Visnet AI Technology Private Limited, Plot.No. 40, MIE - Block-"D", INDUSTRIAL PARK Autonagar, Gajuwaka, Visakhapatnam, AP 530012 IN. For all the other purposes indicated above, the controller or business/service provider is the same entity unless indicated otherwise in other privacy statements communicated in each situation.

Right to Withdraw Consent

In the limited circumstances and based on your country of residence; where you may have provided your consent to the collection, processing, and transfer of your personal data for a specific purpose, you may have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Team (see contacts below). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legal basis for doing so.

Please find below the list of region-wise Data Protection Officers

We have appointed Data Protection Officers (DPOs) to oversee compliance of VISNET with applicable data protection laws and with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the DPO in your region:

Roma RM, Italy - team@visnetai.co

India - team@visnetai.co

Our Commitment to Privacy

Visnet AI Technology Private Limited and its direct and indirect subsidiaries as well as foreign branch offices (which together comprise “VISNET”), are committed to meeting legal and

regulatory requirements regarding data protection and privacy where it conducts its business activities. This Privacy Policy ("Policy") defines the minimum standards with respect to VISNET collecting, processing, or otherwise using personal data, including information that may be considered as sensitive Personal Data ("Personal Data") about individuals including VISNET associates, business contacts, customers or vendors ("Individuals").

Where Visnet AI Technology Private Limited controls other company entities, such other companies will be required to abide by the principles set in this Policy.

PRIVACY PRINCIPLES

VISNET will handle Personal Data in accordance with the following principles. VISNET ensures that its business partners and vendors comply with the principles of this Policy and applicable legal and regulatory compliance standards through appropriate contractual agreements.

Lawfulness of Processing

VISNET will collect, store, process, use, share, transfer, analyze or otherwise handle ("Process" or "Processing") Personal Data in accordance with applicable legal requirements for legitimate business or compliance purpose or if individuals have provided consent to the Processing or any relevant basis as defined by the applicable laws or regulations.

Limit Collection and processing

VISNET will limit the Processing of Personal Data in terms of scope and duration, as is necessary for the intended purpose.

Transparency

In accordance with applicable legal requirements, VISNET will provide information to individuals that explains the scope and purpose of Processing, and whom to contact to seek clarifications about privacy or data protection.

Accuracy

VISNET will take all necessary measures, as required by applicable laws and regulations, to ensure that Personal Data processed are accurate for the intended purpose. Any inaccurate personal data, in the context of the purposes for which they are processed, will either be erased or rectified without delay. Accuracy of data may be subject to the data subject's duty to notify and/or utilise the options as outlined in Privacy Notices.

Security and Confidentiality

VISNET aims to protect the security and confidentiality of individuals' Personal Data and implement physical, technical and organizational measures against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or access. VISNET will ensure measures are appropriate to the risks represented by the Processing it carries out and the nature of those Personal Data.

Privacy by Design

VISNET incorporates the principles of Privacy by Design into all of its personal data processes executed using digital systems, technologies or manually. By default, privacy requirements are embedded into every standard, protocol and process followed by VISNET.

Disclosure

VISNET discloses, when required/asked, personal data to third parties only for the purposes identified in the privacy notice, with the consent of the individual, or as required for lawful purposes. Third parties refer to public authorities, Law Enforcement Agencies and similar authorities.

DATA SUBJECT RIGHTS

In accordance with applicable legal requirements, VISNET will provide opportunity to exercise data subject rights, which are available to the individuals in the context of their engagement with VISNET. Such rights may include the right to request access to their Personal Data, to correct inaccurate or incomplete Personal Data or to object to the Processing of their Personal Data. Each Data Subject Request is validated and tracked to closure. As per the applicable law, and the engagement of data subject with VISNET, there might be other rights available such as right to be forgotten, right to withdraw consent, right to data portability, etc. VISNET will ensure its compliance and deploy all required measures to help data subjects exercise their rights granted.

INTERNATIONAL DATA TRANSFERS

VISNET operates on a global level and from time to time it may be required to transfer Personal Data across countries. VISNET recognizes that Personal Data needs to be treated with care, including data transfer to countries, which may not have adequate data protection laws. If VISNET transfers Personal Data to such countries, it will protect these Personal Data as set out in this Policy and in accordance with the requirements of applicable law.

DATA RETENTION

VISNET will observe retention policies and procedures so that it deletes Personal Data after a reasonable time and the purposes are met. Exception applies if in the context of those purposes, it is necessary to keep the Personal Data indefinitely, or a law requires the Personal Data to be kept for a certain time. When VISNET no longer needs to keep Personal Data for the purposes, for which they are held, it will delete them as soon as practicable.

JURISDICTION-SPECIFIC REQUIREMENTS AND IMPLEMENTATION

National data protection and privacy laws may impose additional requirements on VISNET for the Processing of Personal Data. Where required, VISNET will establish procedures and guidelines in order to supplement the principles of this Policy and engage with relevant regulatory/ supervisory authority, as required.

PRIVACY ORGANIZATION AND CONTACT

VISNET has set up a global Privacy Function, which is headed by the Head - Global Privacy Office of VISNET, and which is tasked with overseeing and implementing privacy and applicable data protection requirements. Specific data protection or privacy functions and roles may be added for individual countries or geographies. VISNET also appoints Data Protection Officers (or comparable function), where required by applicable laws. The privacy function is also responsible for deploying training and awareness programs and supporting the implementation of privacy principles into VISNET business operations and processes. If you have questions about this Policy, please direct them to the contact details provided in privacy notice available at visnetai.co.

DATA BREACH REPORTING

All known or suspected incidents involving Personal Data must be reported immediately upon discovery. This includes incidents notified to VISNET from any VISNET associate, client, third party service provider or other business partner. VISNET will provide education and awareness to its workforce regarding the procedures for reporting a suspected or confirmed incident. Each incident is investigated and tracked to closure.

IMPLEMENTATION

VISNET has internal arrangements in place to ensure compliance with this Policy, to allow effective exercise of individuals' rights set out in this Policy and under applicable law, and to

deal with any concerns from individuals that VISNET may not have complied with the Policy and/or applicable law. All individuals can leverage these arrangements and/or exercise their rights by contacting their local Data Protection Officer.

CHANGES TO THE POLICY

VISNET may update this Policy from time to time and without prior notice to individuals to reflect changes in law or privacy practices. If you have questions about this Policy, please direct them to the Head – Global Privacy Office or to the respective local Data Protection Officer, contact details of whom can be referred from privacy notice available at visnetai.co.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.