



INFORMATION SECURITY AND PRIVACY INFORMATION MANAGEMENT SYSTEM

PRIVACY POLICY

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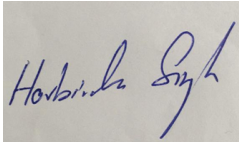

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Document Control Sheet

Version	Date	Reviewer	Approver	Change Description
1.0	16-NOV-2020			Initial Release

Introduction

1. We are committed to safeguarding the privacy of our website visitors and service users.
2. This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
3. We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
4. Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.
5. In this policy, "we", "us" and "our" refer to CogentHub Pvt. Ltd.

What personal information we collect

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- a. **Contact information.** We might collect your name, email, mobile number, phone number, street, city, state, pin code, country, IP address, your family member details, educational qualification details, medical records, bank information etc.
- b. **Information you post.** We collect information you post in our website.
- c. **Other information.** If you use our website, we may collect information about your IP address and the browser you're using. We might look at what site you came from, duration of time spent on our website, pages accessed or what site you visit when you leave us. We might also collect the type of mobile device you are using, or the version of the operating system your computer or device is running.

How we collect personal information

We collect information in different ways:


- a. We collect information directly from you.
- b. We collect information when you provide your details in our website
- c. We get information about you from third parties. For example, recruitment agencies, business partners etc. The third-party social media site will give us certain information about you. This could include your name, email address, contact number, location etc.

How we use your personal data

1. In this Section 3 we have set out:

- a. the general categories of personal data that we may process;
- b. in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- c. the purposes for which we may process personal data; and
- d. the legal bases of the processing.

2. We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing

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is consent OR our legitimate interests, namely monitoring and improving our website and services.

2. We may process your personal data for our internal purposes (“**personal data**”). The usage of your data may include your name, email address, contact number, address, educational qualification, medical details, family member details, bank account details etc. The source of the personal data is you. The personal data may be processed for future reference of any job posting, background verification, medical insurance, performance evaluation, pension benefit etc. The legal basis for this processing is consent.


3. We may process your information included in your personal profile on our website (“**profile data**”). The profile data may include your name, address, telephone number, email address, gender, date of birth. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

4. We may process information contained in any enquiry you submit to us regarding services (“**enquiry data**”). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent.

5. We may process information contained in or relating to any communication that you send to us (“**correspondence data**”). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

6. We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

7. In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

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8. Please do not supply any other person's personal data to us, unless we prompt you to do so.

9. We use information as otherwise permitted by law.

Sharing of your information to third parties


- a. **We will share information with third parties who perform services on our behalf.** We share information with vendors who help us to manage our website, services. Some vendors may be located outside of India.
- b. **We will share information with our business partners.** This includes a third party who provide or sponsor an event, or who operates a venue where we hold events. Our partners use the information we give them as described in their privacy policies.
- c. **We may share information if we think we have to in order to comply with the law or to protect ourselves.** We will share information to respond to a court order or subpoena. We may also share it if a government agency or investigatory body requests. Or, we might also share information when we are investigating potential fraud.
- d. **We may share information with any successor to all or part of our business.** For example, if part of our business is sold we may give our customer list as part of that transaction.
- e. **We may share your information for reasons not described in this policy.** We will tell you before we do this.

Retaining and deleting personal data

1. This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

3. We will retain your personal data as follows: a. [Personal data category or categories] will be retained for a minimum period of [2 Years] following [14-01-2023], and for a maximum period of [5 Years] following [14-01-2026].

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4. In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria: The period of retention of personal data category will be determined based on business requirement.

5. Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.


Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies that we use

We use cookies for the following purposes:

- authentication - we use cookies to identify you when you visit our website and as you navigate our website;
- status - we use cookies to help us to determine if you are logged into our website;
-
- personalisation - we use cookies to store information about your preferences and to personalise the website for you;

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- security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- advertising - we use cookies to help us to display advertisements that will be relevant to you;
- analysis - we use cookies to help us to analyse the use and performance of our website and services; and
- cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally

Cookies used by our service providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

Our details


This website is owned and operated by CogentHub Pvt. Ltd..

We are registered in India under registration number **CIN U74999WB2016PTC217333**, and our registered office is at Martin Burn Business Park, Plot 3, Block BP, Sector V, Kolkata, West Bengal, Kolkata 700091, India.

Our principal place of business is at **Martin Burn Business Park, Plot 3, Block BP, Sector V, Kolkata, West Bengal, Kolkata 700091, India.**

You can contact us: By post, to the postal address given above:

- a. Using our website contact form;
- b. By telephone, on the contact number published on our website from time to time or
- c. By email, using the email address published on our website from time to time

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Data Privacy Officer

Our data privacy officer's contact detail:

Name: Harbinder Singh

Mobile: +91- 8777548475

Landline: +91-33-66426642

Email: harbinder@cogenthub.com

Amendments

1. We may update this policy from time to time by publishing a new version.
2. You should check this page occasionally to ensure you are happy with any changes to this policy.
3. We may OR will notify you of changes OR significant changes to this policy by email or through the private messaging system.

Jurisdiction

If you choose to visit the website, your visit and any dispute over privacy is subject to this Policy and the website's terms of use. In addition to the foregoing, any disputes arising under this Policy shall be governed by the laws of India.

Document review history:

Release Date	Version	Section	Changes Done	Reviewed by	Approved by
16-Nov-2020	1.0		Initial release	Harbinder Singh Ubhi	Avinash Vasa