

## **PRIVACY POLICY**

This privacy policy (“**Privacy Policy**”) explains Our policy regarding the collection, use, disclosure and transfer of Your information collected by the Company as a result of Your access to and use of the Platform and the Services. This Privacy Policy forms an integral part and parcel of, and shall be read in conjunction with, the Terms of Service (hereinafter referred to as “**TOS**”, and accessible [here](#)). Capitalized terms which have been used here but are undefined shall have the same meaning as attributed to them in the TOS.

This Privacy Policy will explain how We use the data collected from You when You access and/or use the Platform.

This Privacy Policy was last updated on 17 May 2021.

### **1. WHAT DATA DO WE COLLECT?**

1.1. Based on Your consent, the Platform collects the following data (“**Information**”):

- 1.1.1. Personal identification information such as Your name and email address (“**Personal Identification Information**”).
- 1.1.2. Log information in an anonymized format to record total visitors to the Platform, number of visitors per page of the Platform, IP address of such visitors, unique identifiers viz., device type, browser type and settings, operating system and application version number (“**Log Information**”).
- 1.1.3. Other automatically tracked Information in an anonymized format in respect of Our Services such as information about when and how You access and use the Platform, such as the date, time and duration of Your visit or use, how You navigate and what You search for using the Platform, how frequently You visit the Platform, customized preferences such as language settings, views and interactions with content and advertisements and activity on third-party platforms that use Our Services (“**Tracked Information**”).
- 1.1.4. Content created, uploaded or saved by You pursuant to access to the Services provided on Our Platform, including any comments published by You on the Platform in respect of content uploaded by Us or any other User to the Platform (“**Uploaded Content**”).

### **2. HOW DO WE COLLECT YOUR DATA?**

2.1. The Company respects Your privacy and is committed to protecting it in all respects. The Information about You comprises (a) Information supplied by You (b) Information automatically tracked while navigation and (c) Information collected from any other source.

#### **2.2. Information Supplied By You**

2.2.1. We collect and process Information:

- 2.2.1.1. When You provide Information for receiving products and services associated with the Platform and/or leave comments on the Platform.
- 2.2.1.2. When You provide feedback, change Your content or email preferences, respond to a survey, or communicate with Us.
- 2.2.1.3. Through cookies or other similar technology placed on Your device (as further detailed below) upon access to Our Platform which collect data including Log Information.

#### **2.3. Information Automatically Collected/ Tracked During User Navigation**

2.3.1. We automatically collect limited Log Information when You visit the Platform. Further, we may use the following tools for the purposes of collecting certain Information about Our Users, as detailed below:

##### **2.3.1.1. Cookies**

We may use “cookies”, or similar electronic tools to collect Information to understand Your individual interests by collecting Tracked Information. Unless You voluntarily identify Yourself,

We will have no way of knowing who You are, even if We assign a cookie to Your computer. The types of cookies used include:

- *Functionality* – The Platform uses these cookies so that We recognize You on the Platform. These cookies are required for basic site functionality and are therefore always enabled. These include cookies that allow You to be remembered as You explore the Platform within a single session or, if You request, from session to session.
- *Performance* - These cookies allow us to improve Our Sites’ functionality by tracking usage. In some cases, these cookies improve the speed with which we can process Your request and allow Us to remember site preferences You have selected. Refusing these cookies may result in poorly-tailored recommendations and slow site performance.

You can set Your browser not to accept cookies and can also choose to remove cookies from Your browser. However, in a few cases, some of Our website features may not function as a result.

#### 2.3.1.2. **Clear GIFs**

We may use “clear GIFs” (Web Beacons) which are images that allow us to track the online usage patterns of Our Users in an anonymous manner and generate statistics about how the Platform is used, without personally identifying the User. We may also use clear GIFs in HTML-based emails sent to Our Users to track which emails are opened by recipients. We use this Information to inter-alia deliver Our web pages to You upon request, to tailor the Platform and Services provided thereunder to the interests of Our Users, to measure traffic within the Platform to improve the quality, functionality and interactivity of the Platform.

#### 2.4. **Information from other Sources:**

2.4.1. We may receive Information about You from other third-party sources to whom You may have consented to provide information, add it to Our User Information database records and use it to communicate with You and provide better Services, while treating it at all times in accordance with this Privacy Policy. Our third-party sources include:

##### 2.4.1.1. **Google Analytics:**

We use Google Analytics, among others, to track the User behaviour on Our Platform. Google Analytics specifically has been enabled to support display advertising towards helping Us gain understanding of Our users’ demographics and interests. The reports are anonymous and cannot be associated with any individual personally identifiable information that You may have shared with Us. You can opt-out of Google Analytics for ‘Display Advertising’ and customize ‘Google Display Network ads’ using the ‘Ads Settings’ options provided by Google.

### 3. **HOW DO WE STORE YOUR DATA?**

3.1. We take appropriate security measures to protect the Platform and Your Information against unauthorized access to or unauthorized alteration, disclosure or destruction. These include internal reviews of Our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where We store personal data. All Information gathered on the Platform is securely stored within the Company controlled database on a best-effort basis. The database is stored on servers secured behind a firewall; access to the servers is password-protected and is strictly limited. However, as effective as Our security measures are, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that Information You supply will not be intercepted while being transmitted to Us over the Internet. Please note that any Information You include in a post to public discussion areas on the Platform is accessible to anyone with Internet access.

3.2. Our Company will keep Your Information stored for a duration of 5 (five) years from the first receipt thereof. Upon expiry of the abovementioned time period, we will delete your Information.

#### **4. HOW DO WE USE YOUR DATA?**

- 4.1. The Platform collects your Information so that it can:
  - 4.1.1. Provide You with information, products and services associated with the Platform;
  - 4.1.2. Respond to You, such as when You place an enquiry with Us, or share a comment or concern;
  - 4.1.3. Remember Your interests and preferences; customize the products and services We share with You; track and categorize Your activity and interests on the Platform; and to enrich your experience on the Platform;
  - 4.1.4. Conduct analytics, such as to understand how You use the Platform to improve Your site experience;
  - 4.1.5. Achieve Our business purposes, such as to maintain Our accounts and records; for research purposes; to determine Your satisfaction with Our products and services; to detect and prevent misuse of Our services; and for any other business purpose that may be permitted by law;
  - 4.1.6. Comply with the legal and safety purposes;
  - 4.1.7. Track the locations from which User traffic is being directed to the Platform and use this Information to improve the Platform's user interface, content personalization and to optimize sales and marketing content;
  - 4.1.8. Send You information about the latest content published on the Platform and other marketing and advertising information that We think You may like, provided You have opted to receive such information;
  - 4.1.9. Notify You of major changes to this Privacy Policy or the TOS.

#### **5. HOW DO WE SHARE YOUR DATA?**

- 5.1. If You agree to this Privacy Policy, We may share Your Information with group companies associated with the Company and officers and employees of such group companies for the purpose of processing personal Information on behalf of the Company. We also ensure that these recipients of such Information agree to process such Information based on Our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
- 5.2. Except as provided under this Privacy Policy, We do not share any personally identifiable Information to third party websites / advertisers without Your consent.

#### **6. MARKETING**

- 6.1. In case you wish to opt-out of any marketing and advertising related communications that You may have previously agreed to receive, please write to Us at [info@kritconsulting.com](mailto:info@kritconsulting.com).

#### **7. YOUR ACCESS TO LINKED PLATFORMS**

- 7.1. The Platform may include links to other websites or applications ("**Linked Platforms**"). The Company is not privy to nor does it exercise any control over the data collection policies of such Linked Platforms, and the User agrees and acknowledges that the Company shall not be held responsible for the data collection policies of any Linked Platform. Once You leave Our servers (You can tell where you are by checking the URL in the location bar on Your browser), use of any information You provide is governed by the privacy policy of the operator of the Linked Platform You are visiting which may be different from this Privacy Policy.

#### **8. YOUR RIGHTS**

- 8.1. You have the right to:
  - 8.1.1. Request access to Your personal Information;
  - 8.1.2. restrict or object to processing of your personal Information under certain conditions;
  - 8.1.3. request a transfer of an electronic copy of your personal Information to You or to another organization (portability);
  - 8.1.4. request correction of Your personal Information if it is incomplete or inaccurate;
  - 8.1.5. request erasure of Your personal Information in certain circumstances provided by applicable law.

- 8.2. These rights are not absolute. Where We have obtained Your consent for the processing of Your personal Information, You have the right to withdraw Your consent at any time.
- 8.3. If You would like to exercise any of Your above rights, please reach out to:

Data Protection Officer/ Grievance Officer  
KRIT Consulting Sàrl  
Chemin de Sandedis 4C,  
1218 GE, le Grand-Saconnex  
Email: [info@kritconsulting.com](mailto:info@kritconsulting.com)  
Telephone: +41 22 7320052

## **9. CHANGES TO OUR PRIVACY POLICY**

- 9.1. We may make changes to this Policy from time to time, and such changes shall at all times reflect on this webpage. When we make material changes to this Policy, we will place updates in the form of a pop-up on the homepage of the Platform.

## **10. GRIEVANCE REDRESSAL/ DATA PROTECTION OFFICER**

- 10.1. Any complaints, abuse or concerns with regards to the processing of Information shall be immediately informed to the designated Data Protection Officer/ Grievance Officer as mentioned below in writing by post or through email signed with Your electronic signature.
- 10.2. We request You to please provide the following information in your complaint:
- 10.2.1. Identification of the Information provided by You.
  - 10.2.2. Clear statement as to whether the Information is personal information or sensitive personal information.
  - 10.2.3. Your full name, address, telephone number or e-mail address.
  - 10.2.4. A statement that You have a good-faith belief that the Information has been processed incorrectly or disclosed without authorization or any other grievance, as applicable.
  - 10.2.5. A statement, under penalty of perjury, that the information in the notice is accurate, and that the Information being complained about belongs to You.
- 10.3. The complaint may be addressed to:

Data Protection Officer/ Grievance Officer  
KRIT Consulting Sàrl  
Chemin de Sandedis 4C,  
1218 GE, le Grand-Saconnex  
Email: [info@kritconsulting.com](mailto:info@kritconsulting.com)  
Telephone: +41 22 7320052

- 10.4. The Company shall not be responsible for any communication, if addressed, to any non-designated person in this regard.

## **11. CONTACTING APPROPRIATE AUTHORITIES**

- 11.1. Should You wish to report a complaint or feel that Our Company has not satisfactorily addressed Your concerns, You may contact the office of the appropriate supervisory authority in Your country.