

# **Privacy Policy**

This privacy policy applies to the processing of personal data by Remfry & Sagar - a partnership firm - carrying on the profession of attorneys at law and having its principal office at Remfry House, Millennium Plaza, Sector 27, Gurgaon - 122009, Haryana ('R&S'). R&S is committed to maintaining the privacy and integrity of personal data including personally identifiable information or personally sensitive information. This policy provides details about the types of personal data that we collect, how we process and protect it together with the rights, persons - including natural persons - have to control our processing of personal data.

By accessing our website or using our services or by otherwise giving us your information, you confirm that you have the capacity to enter into a legally binding contract and have read, understood and agreed to the practices and policies outlined in this Privacy Policy

# **DEFINITIONS:**

- (a) **Processing** in relation to personal data, means a wholly or partly automated operation or set of operations performed on personal data, and includes operations such as collection, recording, organisation, structuring, storage, adaptation, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.
- (b) **Personal data** means any data about an individual who is identifiable by or in relation to such data.

## **COLLECTION:**

We may collect personal data/information from clients, employees, retainers, contractors and other entities/individuals. We understand that all Personal data /information is voluntarily provided by you to us. By using or accessing our website or otherwise providing us with your Personal data /information, you specifically consent to our Processing of your information as described in this Privacy Policy. Usually, we collect information like contact details and organisational roles of our clients, suppliers and other business contacts. This information includes names, addresses, telephone numbers, email addresses and job titles forming part of Personal data. In the course of providing professional services, we may need to request for more information including financial details. We collect information solely when it is necessary for business purposes.

In the event of a change in the law applicable to data protection in India, you hereby expressly consent to our continued use, and Processing of your Personal data /information to the fullest extent permitted under such applicable law. We may reach out to you for obtaining additional consents and approvals as may be required under the amended /new law.

You may choose to not provide us with or withdraw any or all information included under Personal data /information, but in the event that you do so, we may be unable to allow you to access our website or otherwise avail services for the provision of which your information is being collected or Processed.

#### **USAGE**:

The purpose of processing personal data is –

- (a) providing high quality professional services;
- (b) maintaining contact;
- (c) general management and reporting purposes;
- (d) engaging services of professionals;
- (e) compliance with legal or regulatory obligations; and
- (f) other lawful purposes for conducting our profession.

Our Processing of your Personal data /information is based on our legitimate interest to operate an internet website, otherwise to provide legal services, develop and strengthen our business relationship.

#### **DISCLOSURE OF PERSONAL DATA:**

We do not disclose or transfer personal data unless we have the prior and specific permission of the individual or the entity that provided such information on behalf of such individual or where the disclosure is required for us to process the data solely for the purpose for which it was obtained.

If we are required to share the information with our service providers / contractors so as to maximise the quality and efficiency of our services, we require such service providers/contractors to maintain appropriate technical and organisational measures to ensure an appropriate level of security and oblige them to <u>not</u> use or disclose such information for any unauthorised purpose.

#### **SECURITY**:

We have in place appropriate, technical and organisational measures to ensure an appropriate level of security of personal data. Such measures include –

- (a) ability of pseudonymisation or encryption of data, when requested;
- (b) ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- (c) ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- (d) ability to regularly assess the effectiveness of the technical and organisational measures.

#### COOKIES:

You can set your browser to refuse all or some browser cookies or to alert you when a website sets or accesses cookies. If you access our website, you may choose to disable or refuse cookies; in such case, some part of our website may become inaccessible.

### **RETENTION OF PERSONAL DATA:**

We only retain personal data for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

# **YOUR RIGHTS:**

You have the right to –

- (a) request access to your personal data;
- (b) request updation of your personal data;
- (c) opt out request erasure of your personal data or restrict usage of personal data;
- (d) request transfer of your personal data to you or a third party; and
- (e) withdraw consent at any time to process your personal data.

If you wish to opt out of receiving communications from us such as our newsletters and other legal updates, or wish to update, rectify or delete your personal data /information as stored with us, you may do so by emailing us at <a href="mailto:remfry-sagar@remfry.com">remfry-sagar@remfry.com</a>

#### **GRIEVANCE OFFICER AND CONTACT INFORMATION:**

The name and contact details of the Grievance Officer are provided below:

Mr. Rakesh Bhardwaj Remfry & Sagar Remfry House at the Millennium Plaza

Sector 27, Gurugram -122 009 | New Delhi NCR | India

Tel: +91 124 2806100, +91 124 4656100 Email: <u>Rakesh.Bhardwaj@remfry.com</u>

This policy may be updated/amended from time to time in writing.