



PRIVACY AND CONSENT FOR WEBSITE POLICY



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2. PURPOSE:

- 2.1 This policy is to document ‘Privacy and Consent for website Policy’ in compliance with the requirements of European Union General Data Protection Regulation (EU GDPR), Privacy Information Management System (PIMS), and applicable global privacy requirements.
- 2.2 This Policy describes the process of Arcolab as Personally Identifiable Information (PII) Processor and Controller, to collect, use, disclose, and manage information on Arcolab’s website with respect to the protection of PII.

3. SCOPE:

This policy is applicable for Arcolab website to describe how Personally Identifiable Information (PII) is collected, used, disclosed, transferred, retained and disposed where applicable; this includes the use of cookies to improve the performance of Arcolab’s website.

4. ABBREVIATIONS:

EU	European Union	PIMS	Personal Information Management System
GDPR	General Data Protection Regulation	PII	Personally Identifiable Information
DPO	Data Protection officer	DPR	Data Protection Representative

5. TERMS AND DEFINITIONS:

IP Address	The number that is automatically assigned by the Internet Service Provider to the computer being used.
Personally Identifiable Information (PII)	Any information that can be used to establish a link between the information and the natural person (data subject) to whom such information relates or can be directly or indirectly linked to a natural person (data subject).
Privacy Policy	The Privacy Policy is a document that informs users about the use, processing, and disclosure of their personal information collected through a website or mobile application



Personal Data	any information relating to identified or identifiable natural persons (“data subjects”); “identifiable persons” can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to their physical, physiological, genetic, mental, economic, cultural, or social identity;
Consent	any freely given, specific, informed and unambiguous indication of agreement to personal data being processed;
Personal data breach	a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access to personal data transmitted, stored, or otherwise processed;
Cookies	Internet files that store, for a certain period, information about the user’s browsing on the internet;

6. RESPONSIBILITY:

- 6.1. **Top Management/Data Protection Officer (DPO):** The Top Management/DPO is responsible for overseeing the overall compliance with data protection regulations, including the European Union General Data Protection Regulation (EU GDPR) and other applicable global privacy requirements. The DPO will ensure that the policy is up to date, that privacy practices are followed, and that any privacy concerns or breaches are addressed promptly. Top management / DPO in consultation with the DPR/s shall be responsible for any changes and/or additions to this policy.
- 6.2. **IT and Web Development Team:** This team is responsible for integrating privacy and consent mechanisms into the website’s infrastructure. They ensure that data protection measures are effectively implemented, including secure data transmission, user consent capture, and compliance with privacy preferences.
- 6.3. **All Employees:** All employees are responsible for understanding and adhering to the Privacy and Consent for Website Policy in their day-to-day activities. They must ensure that personal data is handled in accordance with the policy and report any potential issues or breaches to the appropriate personnel.



7. POLICY:

7.1. Introduction:

- The Privacy Policy is a document that informs users about the use, processing, and disclosure of their personal information collected through a website or mobile application. A cookie policy only applies to website cookies, which can be used for consumer identification.
- By accessing the Arco Lab Private Limited website, consent to the terms of this Privacy Policy will be provided. Consent will be obtained for collecting the PII data for processing as per the purpose.
- Personal information can be anything that can be used to identify an individual, not limited to the person's name, address, date of birth, marital status, contact information, ID issue, and expiry date, financial records, credit information, medical history, where one travels, and intentions to acquire goods and services. Privacy policy page explains the personal data handling and practices regarding the collection, use, disclosure, and protection of personal information.
- This privacy policy describes company's procedures on the collection, usage, and disclosure of PII data while using this website and meets the requirements established under:
- The company is committed to ensuring that PII data collected is protected and has adopted the "Privacy by Default" principles in its approach to data privacy. If company asks to provide certain information by which company identifies using this website, It is assured that it is used only in accordance with this privacy statement and will not be disclosed or provided to any other party not authorized for processing the data.
- Our privacy policy is subject to change at any time without notice. This policy will be reviewed as required and revised as applicable.

7.2. Contents of Privacy and Consent for Website:

The below information shall be available in company Website as the contents of Privacy and Consent for Website

7.2.1. Scope:

The company is committed to ensuring that your privacy is protected and has adopted the "Privacy by Default" principles in its approach to data privacy. If we ask you to provide certain information by which company identifies you when using this website, you can be assured that it will only be used in accordance with this privacy statement and will not be disclosed or provided to any other party.



Our Privacy and Consent for Website Policy is subject to change at any time without notice. To make sure, you're aware of any changes, please review this policy periodically. This policy for this website is effective as of the date indicated above.

7.2.2. Cookie Policy:

A cookie is a small file that asks permission to be placed on your electronic device which support browsing. Once you agree, the file is added, and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes, and dislikes by gathering and remembering information about your preferences.

We may use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes, and then the data is removed or anonymize it from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

7.2.3. IP Address:

Whenever a user visits Arcolab's website, the IP Address is identified and logged automatically in Arcolab's server along with the time of the visit and the pages that were visited. IP Addresses are used for helping diagnose server problems and administering the website.

Note: Collecting IP Addresses is a standard practice and done automatically by many websites.

7.2.4. Collection of information:

We may, if required to interact with you subject to your consent and requirement, collect the following information:

- Name and job title
- Contact information, including mobile number and email address.
- Other information relevant to customer surveys and/or offers
- Information specified as per Integrated Information Security and Privacy Information



Management Policy and Integrated Information Security and Privacy Information Management Manual.

7.2.5. Use and disclosure of collected information:

We only hold what data we need for the purpose for which we obtained it. We delete your data when we believe the purpose for which you shared it has been fulfilled. If you do not want us to keep your data, please contact us via the email address provided in this privacy statement, and we will delete your data from our records as required by applicable laws.

Providing your personal information to Arcolab is voluntary and you may refuse to provide any personal information. If there's no personal information provided to Arcolab, we may not be able to communicate with you to provide any information on our products and services. If we have collected your consent to process your personal information, you may withdraw the consent by contacting us at data.protection@arcolab.com.

Arcolab does not disclose the information collected to any unauthorized third party.

However, we reserve the right to retain data for such a period as required under any applicable law.

What we do with the information we gather?

We require this information to understand your needs and provide you with better service, and in particular for the following reasons:

- Enable the secure online authentication, interaction and transaction with natural persons.
- To display information or provide a service that meets your needs.
- Internal record-keeping.
- We may use the information/feedback anonymously to improve our products and services or to respond to your queries that you may post to us through this website.
- With your consent, we may periodically send promotional emails about new products, special offers, or other information that we think you may find interesting using the email address that you have provided.

7.2.6. Retention period:

How long does Arcolab hold your personal data?

We only hold what data we need for the purpose for which we obtained it. We delete your data when we believe the purpose for which you shared it has been fulfilled. If you do not want us to keep your data, please contact us via the email address provided in this privacy statement, and we will delete your data from our records as required by applicable laws.



Providing your personal information to Arcolab is voluntary and you may refuse to provide any personal information. If there's no personal information provided to Arcolab, we may not be able to communicate with you to provide any information on our products and services. If we have collected your consent to process your personal information, you may withdraw the consent by contacting us at data.protection@arcolab.com

Arcolab does not disclose the information collected to any unauthorized third party.

However, we reserve the right to retain data for such a period as required under any applicable law.

7.2.7. **Security:**

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable organizational, technical, and administrative measures to safeguard and secure all personally identifiable information under Arcolab's control.

If there is any reason to believe that user's personally identifiable information has been compromised, Arcolab requests them to inform immediately by sending an email to data.protection@arcolab.com or submit a complaint.

7.2.8. **Data Subject Rights:**

Subject to the conditions laid down, all individuals or data subjects have the right to request that their personal data be made available.

If any personal information submitted to Arcolab, including its affiliates and subsidiaries, needs to be restricted, reviewed, corrected, updated, or deleted, such requests shall be sent to Arcolab at data.protection@arcolab.com.

All requests shall be complied as soon as possible based on the applicable laws and regulations. Arcolab may place any data on legal hold and promptly notify the individuals to fulfill legal obligations.

Arcolab shall give each person the opportunity to make his or her choice on how information gathered may be used and at any time opt out of our services. You will have the opportunity to opt out of our newsletters, email subscriptions or any information provided by Arcolab. Whenever a person wishes to change the information supplied or notify Arcolab that it intends to limit the sharing of this information with third parties, they may do so at any time.

Such requests shall be submitted to Arcolab at data.protection@arcolab.com. All requests shall be complied as soon as possible or within 30 calendar days.



7.2.9. How to Submit a Complaint:

Compliance with privacy legislation and best practices is a priority for Arcolab. Contact the Data Protection team of Arcolab by email or phone if you need to file a complaint about data privacy issues at Arcolab and they will handle any problem as soon as possible. Below are the contact details.

Attention:

Data Protection Officer: Ms. Prathima P D

Phone: +91 7337614497

Office Address: Arcolab Private Limited, 19/2, 15th Cross Rd, Dollar Layout, 4th Phase, J.P. Nagar, Bengaluru, 560078 Email: data.protection@arcolab.com.

7.2.10. Updates to this Privacy Policy:

The Privacy Policy shall be reviewed periodically and updated as per internal procedures. Any changes to this Privacy Policy will become effective once it is posted onto the website.

7.2.11. Use of Site by Minors:

Individuals younger than 18 years are not authorized to use the Arcolab website. Arcolab requests all users below 18 years of age not to provide any personal information on its website.

7.2.12. Cross-border Transfer:

Any country in which Arcolab operates may have personal data collected on its web site stored and processed; all sites of Arcolab will process the information safely according to the PIMS requirements. Arcolab understands that the user will agree to transfer information into countries outside his or her country of residence by providing this consent on its website. Arcolab shall be responsible for data handling in respect of the onward transfer of personal data by Arcolab to third parties.

7.2.13. Sensitive Information:

No sensitive personal information is requested by Arcolab, on or through its website, concerning racial and ethnic origins, political views, religious beliefs, health status, criminal history, or membership in a trade union.

This shall be carried out by informed consent of the data subject in cases where such a request may be made of



7.2.14. Consent:

Arcolab requests user’s acceptance for collection, saving, and use of Personally Identifiable Information as described in this Policy by clicking the “I accept” button on the website.

User may click “I do not accept” if they do not consent and do not wish to accept the functions on Arcolab’s website.

7.2.15. Contacting Arcolab:

If the users have any questions about this Privacy Policy, contact us on the “Contact us” page or email us at data.protection@arcolab.com.

7.2.16. Disposal:

Arcolab disposes of the collected personally identifiable information after the retention period as allowed by law or other regulatory requirements.

8. APPENDIXES/ANNEXURES:

Not Applicable

9. REFERENCES:

- 9.1. EU General Data Protection Regulation (2016/679)
- 9.2. ISO 27701:2019 Security Techniques – Extension to ISO/IEC 27001 and ISO/IEC 27002 for privacy information management – requirements and guidelines
- 9.3. ISO 27001 Information Technology – Security techniques – Information security management systems – requirements
- 9.4. Integrated Information Security and Privacy Information Management Policy
- 9.5. Integrated Information Security and Privacy Information Management Manual.
- 9.6. SOP No. AL/QA/006: Document Management.

10. REVISION HISTORY:

Version No.	Changes Incorporated	Effective Date
R0	Old Policy Contents added into the standard policy template with numbering	Last Signature Date



11. APPROVALS:

	Name with Designation	Signature with Date
Prepared By:	Siva Dinesh Dara Process Lead, Quality Assurance	
Reviewed By:	Nikhil Ramesh Akarte, Process Lead, Quality Assurance	
Reviewed By:	Mahesh V Senior Lead, Information Technology (Chief Information Security Officer)	
Reviewed By:	Prathima P D Associate Director, Medical Affairs (Data Protection Officer)	
Approved By:	Shashidhar K L Head - Arcolab	