

Privacy Notice for Web-Portal Visitors (Articles 12, 13, & 14)

Document Number: NGPSPL-DPO-2020-002-3

Document Version: 1.1

NOTE: Meant for visitors of web portal (www.kleeto.in), employees within the organization including sales team and external staff associated with business operation.

Copyright 2020 NGPSPL All Rights Reserved.

No part of this document may be reproduced, stored in a retrieval system, distributed or transmitted, in any form, or by any means, electronic or otherwise, including photocopying, reprinting, or recording, for any purpose, without the express prior written permission of Next Gen Paper Solutions Pvt. Ltd., Gurugram, Haryana; hereinafter referred to as “NGPSPL”.

REQUESTS: For information requests or for obtaining permission for the use of this work, please submit a written request to: Sales & Marketing, Next Gen Paper Solutions Pvt. Ltd., Plot No - 424, First Floor Udyog Vihar, Phase-IV, Gurgaon (Haryana) - 122016 India.

Revision History

S. No	Version	Date	Author	Approval by	Remarks
1.	1.0	30 November, 2018	Nandita Saxena	Naresh Chand	Draft, Supersedes the earlier documented versions and updated with respect to current practices.
2.	1.1	07 February, 2020	Nandita Saxena	Naresh Chand	Minor Changes – making it ready for implementation phase
3.					
4.					
5.					

Privacy Notice for Web-Portal Visitors

This privacy policy explains how personal data is collected and used when you use our web-portals. It also explains how we process any data that you supply to us on this web-portal, for instance to request a quote or to use our online services.

NGPSPL is the Data Controller for any personal data that you supply to us during your visit to our web-portal.

Our office address is as follows:

Next Gen Paper Solutions Pvt. Ltd.,
 Plot No - 424, First Floor Udyog Vihar, Phase-IV,
 Gurgaon (Haryana) - 122016 India.
 Toll Free Number: 1-800-419-0568
 Email ID: sales@kleeto.in
 Web-portal: <https://www.kleeto.in>

1. WHAT PERSONAL DATA WE COLLECT

The personal data collected depends on how you use our web-portal. You can browse the site, you can fill in forms on the web-portal to request information or quotes from us, download documents from us, or you can subscribe to our emails, and other activities. Our web-portal collects personal data to provide these services.

We collect information about you when you visit our web-portal; subscribe to our newsletters or to receive our publications; apply for employment with us; attend one of our seminars; send us email for information or support, and engage in business dealings with us.

2. WHAT WE DO WITH YOUR PERSONAL DATA

When you visit our web-portal, a record of your visit is made. This data includes your device's IP address. That data is used completely anonymously, in order to determine the number of people who visit our web-portal and the most frequently used sections of the site. This enables us to continually update and refine the site. If you use any forms on the web-portal to send an email to us, a record will also be made of your name, your company name, email address and your telephone number.

The following table sets out how we handle your personal data and our legal basis for doing so under EU GDPR 2016 and the Data Protection Act 2018.

WHAT WE DO	OUR LEGAL BASIS UNDER GDPR
Use the personal data that you provide on our web forms and questionnaires	Article 6(1)(b) - when you provide us with your personal data, for instance to obtain a quote for our services, this is a necessary step to take at the request of the data subject prior to entering into a contract.
Provide our online services platforms, i.e., https://www.kleeto.in	Article 6(1)(b) - this is necessary for the performance of a contract with you, our data subject.
Contact you regarding the services we provide	Article 6(1)(f) - we need to contact you for our legitimate interests so that we can gather more information for the provision of our services, or to deliver those services most effectively.
Retain your data under our data retention policy after your contract has expired	Article 6(1)(f) - we need to retain your personal data for only as long as necessary under the law to protect our legitimate interests.
Where you require us to make reasonable	Article 9(2)(a) of GDPR (explicit consent).

<p>adjustments to enable you to attend a meeting or appointment, we may require further information from you.</p>	<p>If this includes information (being sensitive personal data), will only be used by us, with your explicit consent, to assess your eligibility for reasonable adjustments. We will not share or disclose it to others.</p> <p>You can withdraw your consent as anytime by contacting us. Please note that we may not be able to process your request for reasonable adjustments if you do this.</p>
---	---

The following table sets out the categories of personal data that we obtain.

Personal Data	Explanation
<p>Name, postal address, email address, web-portal, identification number, location data, company name, online identifier - these are classed as personal data</p>	<p>This data is provided by you on our web forms, or contract agreement questionnaires, either to obtain further details of the product and / or the commercials details from us.</p> <p>Subscribing to our Newsletters or Service Request or as part of the provision of your existing contractual services.</p> <p>This data may be provided if you apply for a job opportunity.</p>

We may collect, hold, use and disclose the information collected to compile statistical data and to; maintain our database; develop/improve our web-portal; respond to any email enquiries; notify you of any upcoming marketing, training or other events that you have opted in to; provide you with publications; manage quality control; manage systems administration; attend to compliance issues; provide you or your organization with advice and determine suitability for employment.

We will not use or disclose your personal information for any other purpose which is not related (or in the case of sensitive information, directly related) to the above purposes without your consent, unless otherwise authorized, required or permitted under the regulations of EU GDPR 2016.

The NGPSPL does not sell your data to third parties.

If you no longer wish to receive information about our services, you can click on unsubscribe on our web portal or please send an email to our Data Protection Officer at naresh.chand1@kleeto.in advising that you do not wish to receive further information.

3. WILL WE DISCLOSE YOUR DATA?

Personal data will only be disclosed on a confidential basis to external service providers so that they can provide services such as financial or administrative services in connection with the operation of our business; and to any person (where necessary) in connection with their services, such as law enforcement, regulatory authorities, partners or advisors; or to companies within India.

The handling of these operations is governed by a data processing contract between us and our external service provider, ensuring a commitment to the principals of the GDPR and the Data Protection Act 2018. We ensure external service providers are only authorized to use personal data for the limited purposes specified in our agreement with them.

4. HOW LONG WE KEEP YOUR PERSONAL DATA

Personal data from our data subjects is retained in line with our data retention policy. The NGPSPL keeps most data for 8 years, which covers the 7 years by law in which we have to keep certain information for a minimum of 7 years plus the current year. Personal data that is no longer necessary to be kept under the NGPSPL's data retention policy will be deleted.

5. YOUR RIGHTS

You have the following rights in relation to personal data held on you by the Group:

- The right to be informed about how personal data is used - (this notice)
- The right to access a copy of personal data that the Group holds about you
- The right to rectification of any errors in personal data held by the Group
- The right to erasure of any personal data
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making including profiling

If you wish to learn more about these rights and how they operate, please look at the ICO's web-portal <https://ico.org.uk/for-the-public/>.

NGPSPL does not operate any automated decision making systems.

You have a right to request a copy of the personal data that we hold about you. If you would like a copy of some or all of your personal data please email naresh.chand1@kleeto.in or write to our Data Protection at **Next Gen Paper Solutions Pvt. Ltd.**, Plot No - 424, First Floor Udyog Vihar, Phase-IV, Gurgaon (Haryana) - 122016 India. Proof of your identity will be required for security purposes.

If you are unhappy with the response that you receive from us when you exercise your GDPR rights or Data Protection Act 2018 rights, you have the right to lodge a complaint to the ICO.

More guidance about raising a complaint with us is available on the ICO's web-portal <https://ico.org.uk/for-the-public/raising-concerns/> and for raising a complaint with the ICO, more information is available on <https://ico.org.uk/concerns/>.

6. COOKIES

This web-portal uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of this web-portal and compile reports for us on activity on the web-portal. Google stores the information collected by the cookie on servers in the United States and the transfer of the data to servers in the USA is governed by the EU-US Privacy Shield framework. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this web-portal, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Cookies are text files placed on your computer to collect standard internet log information and visitor behavior information. This information is used to track visitor use of the web-portal and to compile statistical reports on web-portal activity.

You can set your browser not to accept cookies and the above web-portals tell you how to remove cookies from your browser. However, in a few cases some of our web-portal features may not function as a result.

7. OTHER WEB-PORTALS

Our web-portal may contain links to other sites. This privacy policy only applies to this web-portal so when you link to other web-portals you should read their own privacy policy.

8. HOW TO CONTACT US

Please review the web-portal regularly as this statement may change from time to time. If you have any questions about our privacy policy or information we hold about you please contact:

Naresh Chand,
Data Protection Officer
Toll Free Number: 1-800-419-0568
Email ID: naresh.chand1@kleeto.in