



Data Privacy and Protection Policy

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1 Purpose

To ensure the Personal, Supplier, Third party and Clientele information collected by Cambridge Technology (CT) through all means is secured and protected to maintain data privacy with respect to personally identifiable information

2 CT Privacy Statement

The following privacy policy also read as Data Privacy Policy applies to Personal, Third Party, Clientele and Supplier's personally identifiable information collected by CT. CT is committed in protecting the privacy of data.. Because CT gathers certain types of information about the users of the Services, we believe you should fully understand the terms and conditions surrounding the use of the information we collect.

The following discloses our information gathering and dissemination practices for the Services. If you are using any of the Services through institution that is a customer of CT, this policy does not supersede the terms of any agreements between CT and any other party, nor does it affect the terms of any agreement between any user of the Services and their employer or third party.

Please make sure that you read the terms of any privacy policies that you enter into with parties other than CT, including third party, as those policies may also explain how your personal information is used by those parties.

Please review the following statement to understand how the information you provide to CT through the Services will be treated.

3 Information CT collects.

Everyone who intend to gain knowledge about CT offerings are free to utilize the Services without identifying yourself, however, if you would like to utilize or customize some features of the Services, you must first register with CT. When you register, we will request certain personal information, including, but not limited to, contact information, such as your name, city and state, and e-mail address etc.

This information better enables us to provide you with content relevant to your interests and provides us with aggregate data that CT uses to improve the Services. We may also ask you for information about your system or how you use CT products and services.

CT gathers information about all users collectively, such as what areas users visit most frequently and what services users access most often. CT automatically logs IP addresses, session sources, and other data which tracks users' access to the Services. We analyze these logs for sales and marketing purposes as well as system performance monitoring.

These logs are analyzed for the aggregate trends they reveal about our customers and how the customers use the Services, not for the behaviors of individual users.

4 Purposes of Data Collection

CT requests personal information for purposes such as the provision of customer service and support, customer surveys, sales management, support, newsletter subscriptions, offers of related services, and other exchanges of information.

5 What CT does with the information it collects.

The personal information you supply to CT will not be given, sold, rented, loaned, or otherwise disclosed to any third parties outside of CT and its agents, except when we have your permission or under special circumstances, such as when we believe in good faith that disclosure is reasonably necessary to (i) comply with legal process, (ii) enforce the Terms of Use, (iii) respond to claims that any content provided by using the Services violates the rights of third parties, or (iv) protect the rights, property, or personal safety of CT, its users, or the public.

CT may use aggregated personal information to determine the demographic composition of our user base and to distribute statistics and general marketplace information about CT. This aggregate information does not identify specific users.

Certain non-personal information regarding users is recorded by the standard operation of the Internet servers hosting the Services. This information is primarily used to provide users of the Services with an enhanced online experience. CT may disclose aggregated user statistics in order to describe the Services to prospective partners, advertisers, and other third parties, and for other lawful purposes.

6 Legal basis for Processing of Personal Data

Delivery Projects and functions need to identify the legal basis for processing personal data before any processing operations take place by clearly establishing, defining and documenting, the specific purpose of processing the personal data and the legal basis to process the data under:

- Consent obtained from the data subject (employee);
- Availability of an agreement or contract where the data subject is a Third party;
- Legal obligations that CT is required to meet, including the Law of the Land
- Protect the vital interests of the data subject, including the protection of rights and freedoms;
- Legal team of CT to process the data or is it or the purpose of carrying out the processing that is in the public interest;
- Necessary for the legitimate interests of the data controller or third party, unless the processing is overridden by the vital interests, including rights and freedoms;

In addition to the above, in case of any special categories of personal data processed and the availability of the legal basis to process the data under:

- Explicit consent obtained from the data subject;
- Necessary for employment rights or obligations;
- Protect the vital interests of the data subject, including the protection of rights and freedoms;
- Necessary for the legitimate activities with appropriate safeguards;
- Personal data made public by the data subject;
- Legal claims;
- Substantial public interest;
- Preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, provision of health or social care treatment, or management of health and social care systems and services, under the basis that appropriate contracts with health professionals and safeguards are in place;
- Public health, ensuring appropriate safeguards are in place for the protection of rights and freedoms of the data subject, or professional secrecy;
- National laws in terms of processing genetic, biometric or health data.

7 Privacy Notes

When personal data collected from data subject with consent, Delivery Projects and functions need to be transparent in its processing of personal data and provides the data Subject with the following information, to demonstrate that the processing is fair and transparent.

- CT identity, and contact details of the CISO & GISO/Information Security Coordinator
- The purpose(s), including legal basis, for the intended processing of personal data
- Where relevant, CT's legitimate interests that provide the legal basis for the processing;
- Potential recipients of personal data;
- Any information regarding the intention to disclose personal data to third parties and whether it is transferred outside, in case the data subject is EU resident/citizen. In such circumstances, CT will provide information on the safeguards in place and how the data subject can also obtain a copy of these safeguards;
- Any information on website used to collect personal data about the data subject;
- Retention period;
- Information on the data subjects rights to access
- Right to lodge a complaint
- Right to withdraw consent

- Information on why processing is necessary if it's a statutory or contractual requirement; any automated decision making (profiling), and any other further purpose to the processing other than that originally collected for.

Delivery Projects and Functions shall ensure information provided to the data subject is in (Concise, transparent, intelligible, can be oral if requested by data subject, free of charge) an easily accessible format email/pdf/printed, using clear and plain language, especially for personal data addressed to a child.

Delivery Projects and functions shall ensure Privacy notice for all personal data processing is recorded for audit requirements.

When data is contractually required for processing, Delivery Projects and functions processes data without consent in order to fulfil contractual obligations such as bank details to process salaries, postal address in order to courier etc. Privacy notice for such cases of personal data processing is recorded on website, on application form and internal portal.

When personal data has been obtained from a source other than the data subject, Delivery Projects and functions makes clear the types of information collected as well as the source of the personal data (publicly accessible sources) and provides the data subject with:

- Identity, and contact details of the CISO & GISO/Information Security Coordinator
- The purpose(s), including legal basis, for the intended processing of personal data;
- Categories of personal data;
- Potential recipients of personal data;

8 User Options -- Opt-Out

Users may opt out of receiving future promotional electronic mailings from CT by following the unsubscribe procedures indicated in the mailing. Individual end users of CT software should contact their organization hosting the software for questions about access to the personal information collected by that institution. Please contact us at the address below if you have other questions about the information you receive from us or the information that we collect from you.

9 Security

All of your personal information is stored on servers at a location designed specifically to ensure that no unauthorized individuals have access to the server or its data.

If you have any questions regarding this policy, please contact:

INDIA:

Hyderabad

Unit No 04 -03, Cyber Pearl, Level 4, Block 1, Hitec City, Madhapur, Hyderabad - 500 081,

Telangana

Phone: +91-40-4023 4400

Fax: +91-40-4023 4600

10 CT Privacy Policy Statement Changes

If CT changes this privacy statement, we will post those changes all the concerned so that you will always know what information we gather, how we might use that information, and whether we will disclose it to anyone. By using the Services, you signify your assent to the CT Privacy Policy Statement.

11 Contact CT

In the event that you are concerned about how data you have provided CT through the Services has been used, please contact us at one of the addresses listed above. CT takes all concerns about privacy and use of data very seriously, and shall endeavor to reply to you within two business days to commence its investigation of your concern.