

## **GDPR Privacy Policy**

### **1) DEFINITIONS**

- **Data Controller:** Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.
- **Data Processor:** Data Processor means any natural or legal person who processes the data on behalf of the Data Controller.
- **Data Subject:** Data Subject is any living individual who is using our Service and is the subject of Personal Data.
- **Personal data:** Any information relating to an identified or identifiable person; country-specific notices might adopt a different terminology.

### **2) DATA COLLECTOR**

Your privacy is important to us and we believe it is important for you to know about what personal data we may collect. In the following Privacy Policy **“company/our/us”** means the DRC Systems India Limited; third party means someone who is not you or us. Our registered office is DRC Systems India, 24th Floor, GIFT Two Building, Block No. 56, Road-5C, Zone-5, GIFT CITY, Gandhinagar, Gujarat.

This Privacy Policy will specify the types of personal data DRC Systems, obtains through <https://www.drccsystems.com/>, and/or any related services, sales, marketing or events and how you may exercise your rights relating to our processing of data. The Privacy Policy additionally describes the measures

we take to secure your personal data and how you can contact us to learn more about our privacy practices. For the purpose of this Privacy Policy, data is which relates to an individual who may be identified from that data, or from a combination of a set of data, and other information which is in possession of DRC Systems.

This Privacy Policy applies to all the products, services, websites and apps offered by DRC Systems, and its affiliates, partners, except where otherwise specified.

### **3) PROCESSING OF YOUR PERSONAL DATA**

#### **a) Legal Basis for the processing of personal data**

- i.** Fulfilment of the contract or implementation of pre-contractual measures (Art. 6 para. 1 b of GDPR): Unless expressly stated otherwise, data will only be processed by us to the extent necessary for the exercise and fulfilment of the rights and obligations arising from the contract. Unless expressly stated otherwise, data will only be processed by us to this extent.
- ii.** Justifiable Interest (Art. 6 para. 1 f of GDPR): Processing takes place insofar as we have a legitimate interest and no conflicting overriding interests of the data subject are apparent. The specific interest is explained in this privacy policy within the framework of the processing description.
- iii.** Consent (Art. 6 para. 1 a of GDPR): Data will be processed to the extent you have expressly agreed to the type and scope of data processing. You can revoke your consent at any time with effect for the future, but this does not affect the processing that has taken place up to this point in time.
- iv.** Legal Obligation (Art. 6 para. 1 c of GDPR): Processing data takes place insofar as this is necessary to fulfil German or European statutory obligations.

#### **b) Processing of Protocol Data**

When you visit our website, we process the following log files from you, which do not allow any inference to your personal information.

- i. The date and time of day of your visit
- ii. The web sites which you have visited of us and
- iii. The web site from which you are visiting our web site.
- iv. Other points that they wish to add.

The legal basis for processing this personal data is our legitimate interest of being able to provide the website properly (Article 6 paragraph 1 letter of GDPR). This personal data is only being processed as long as you are accessing our website.

**c) Personal Information that we collect.**

- i. Information that you provide via our website, including information you provide when you register on our website e.g. name, email address, designation, company, country, telephone number and may vary from project. Further, our company if focused on providing IT solutions, in order to facilitate the process, the client needs to provide us with the database containing personal details of their client as well as their customers

**d) Use of Personal Information**

We use the Personal Information Provided by you for the following purposes.

- i. to provide better usability, troubleshooting and site maintenance;
- ii. to understand which parts of the website are visited and how frequently;
- iii. to create User IDs.
- iv. to identify you once you have created an ID and registered with us.
- v. to provide access to desirable content based on your preference.

DRC Systems uses cookies (small text files placed on your device) and similar technologies to facilitate proper functioning of our websites and to help collect data.

#### **4) HOW WE WILL KEEP YOUR INFORMATION PROTECTED**

##### **i. Retention Period for Personal Data.**

We have put in place appropriate technical, organizational and security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

##### **ii. How Long We Will Keep Your Information?**

We will only retain your personal data for a period of **THREE –Years** beginning for the date of completion of service contract for the purposes of satisfying any legal, accounting, or reporting requirements [if any]. Further, on request by our customers we can delete the personal information earlier as well.

Details of retention periods for different aspects of your personal data are available in our retention policy upon request from our Data Protection Officers (see contact details below). To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of

the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

#### **5) USE OF COOKIES:**

Our site (or any third-party service used by our site) uses cookies, we inform users about our data collection activities and give them the option to choose whether it's allowed or not; we obtain informed consent prior to the installation of those cookies. In practice, we show a cookie banner at the user's first visit, implement a cookie policy and allow the user to provide consent. Prior to consent, no cookies - except for exempt cookies - can be installed.

#### **6) KNOW YOUR RIGHTS**

You may assert any of the below mentioned rights against DRC Systems at any time upon a free of charge basis. For any further assistance or information concerning the exercise of your Rights, please see ***the concerned person detail***

**Your Duty to Inform us of Changes.** It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

- i. **Request Access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you.
- ii. **Request Correction** of the personal data that we hold about you. This enables you ask us to have any incomplete or inaccurate information we hold about you corrected.
- iii. **Request Erasure Of Your Personal Data.** This enables you to ask us, in certain situations, to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing.
- iv. **Object To Processing Of Your Personal Data:** If the data processing is based on your consent or our legitimate interest, you have the right to object to the processing or to revoke your consent at any time. Your objection or revocation will only have an effect for the future. If the analysis Cookies used offer their own technical solution for deactivation, this is explained respectively; you can contact [dpo@drcsystems.com](mailto:dpo@drcsystems.com) at any time to exercise your right of objection or revocation. If you object to data processing on the basis of our legitimate interest, we may nevertheless continue processing if we can prove compelling reasons worthy of protection for the processing which outweigh your interests, rights and freedoms.

v. **Request The Restriction Of Processing Of Your Personal Data.**

This enables you to ask us, in certain circumstances, to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

vi. **Data Portability:** This enables you to ask us, in certain circumstances, to provide you with the personal data you have provided to us in a structured, commonly used and machine-readable format or to transmit the personal data that you have provided to us to another party.

vii. **Automated Decision-Making:** The right not to be subject to a decision based solely on automated processing that produces legal effects concerning you or similarly significantly affects you.

It is to be noted that if you exercise any of the above rights, we may need to request specific information from you to help us confirm your identity and that you are entitled to make such a request. This is to ensure that personal data is not disclosed to any person who has no right to receive it.

## **7) CHANGES TO PRIVACY POLICY.**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal data.

**8) PLEASE FIND BELOW THE LIST OF REGION WISE DATA  
PROTECTION OFFICERS.**

We have appointed Data Protection Officers (DPOs) to oversee compliance of DRC SYSTEMS with applicable data protection laws and with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the DPO the below mentioned e-mail:

[dpo@drcsystems.com](mailto:dpo@drcsystems.com)