



WEBSITE PRIVACY POLICY



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www.cisocybersecurity.com

TABLE OF CONTENTS

SECTION I – DOCUMENT CONTROL	3
1.1. Document Management Information	3
1.2. Document Issue Details	3
SECTION II – POLICY	4
2.1. Information We May Collect	5
2.2. How We Collect Information.....	7
2.3. Choice	8
2.4. Use and Disclosure of Your Personal Information.....	9
2.5. Data Storage and Security.....	11
2.6. Children and Data Collection.....	12
2.7. Rights over your personal data	12
2.8. Access to and Modification of the Information Collected	13
2.9. Data Integrity	13
2.10. Enforcement	14
2.11. General Information and Privacy Support Contact	14
2.12. Right To Complain to The Data Protection Authority	14

SECTION I – DOCUMENT CONTROL

1.1. Document Management Information

SNo.	Description	Remarks
1	Document Title	CCPL_PIMS_PL_Website_Privacy_Policy_V1
2	Document Number	CCPL/ PIMS/ /PL/001
3	Document Version	1
4	Document Owner	Privacy Information Management System Implementation Committee
5	Documents Author(s)	Privacy Information Management System Manager
6	Document Change Reviewer	Data Protection Officer
7	Document Release Date	07/05/2023
8	Effective Date	Effective on Release
9	Document Approved By	Information Security Implementation Team
10	Document Approval Date	07/05/2023
11	Next Revision Due Date	One year from the date of release or earlier if required
12	Security Classification	Internal

1.2. Document Issue Details

SNo.	Description	Remarks
1	Issue Number	1
2	Is this a Controlled Document	Yes
3	Number of Copy	1
4	Document Issued by	Data Protection Officer
5	Signature of DPO	

SECTION II – POLICY

CISO CYBERSECURITY PRIVATE LIMITED (CCPL) – WEBSITE PRIVACY POLICY

CISO CYBERSECURITY PRIVATE LIMITED (CCPL) (or 'we'/'us'/'ours') respects and understands the importance of your privacy – and are therefore committed to affording complete protection to the personal information of our customers, subscribers who use our products and services or visitors of our website, and of the learners whose information we may have access to and when you apply on our website for an open position or for collaboration. Data Privacy is important to us and we strive to be transparent in our data collection and use practices. It is in recognition of this need for security, our commitment to Secured management of any information received /collected by us and EU GDPR that CCPL has established this Privacy Policy.

CISO CYBERSECURITY PRIVATE LIMITED (CCPL) has created this web site Privacy Policy in order to demonstrate that it is committed to implementing measures designed to protect the privacy of those using our services and accessing this website <https://cisocybersecurity.com/>, This privacy policy is applicable to our websites - <https://www.digiproctor.com> , <https://www.easytalent.in/> support and any services we provide. It also applies to our marketing practices. We ensure total transparency in all our interactions with data subjects.

This Privacy Policy is formulated in accordance with the Information Technology Act, 2000 ("IT Act") read along with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Date or Information) Rules, 2011 ("IT Rules").

The domain name <https://www.CCPL.in/> (hereinafter referred to as "website") is owned by CISO CYBERSECURITY PRIVATE LIMITED, a company incorporated under the Companies Act with its registered office

- The Statesman House, First Floor, Statesman Chambers
- 148, Barakhamba Road, New Delhi – 110001

It is clarified that "CCPL" shall include its affiliates and associate companies, directors, officers or employees.

The following discloses our information gathering, usage and dissemination practices for the website. By using or accessing the website you hereby accept and consent to the terms of this Privacy Policy. Please note that our website may contain links to websites of other organisations and when you access such external links, they may have different privacy policies specific to those websites. We encourage you to read all privacy policies posted on the websites that you visit. If you do not agree with any terms of this Privacy Policy, please do not use this website or submit any personal information or sensitive personal information to CCPL.

Throughout this document, “we”, “us”, “our”, “ours” refer to CCPL. The terms “client”, “user”, “you”, “your” and “yourself” or similar terminology are all in use in reference to the individual user of this website.

2.1. Information We May Collect

What information is collected?

CCPL may collect (i) personally identifiable information like name, telephone number, e-mail address, etc.; (ii) personal information; and (iii) sensitive personal information. While you can browse some sections of our website without requiring registration, certain activities (such as placing an order) or accessing certain areas of the website shall require you to register. We may also maintain a record of your product interest and acquire information about you for our present and/or future affiliates.

The IT Act and the IT Rules define personal information as any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate is capable of identifying such person.

The IT Act and the IT Rules define sensitive personal data or information of a person as meaning such personal information which consists of information relating to: (i) password, (ii) financial information such as Bank accounts, debit or credit card, (iii) physical, psychological and mental health condition, (iv) sexual orientation, (v) medical records and history, (vi) biometric information, (vii) any detail relating to the above as provided to the body corporate for providing a service, and (viii) any of the information received under each of the heads by the body corporate for processing, or to be stored or processed under a lawful contract.

Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of the IT Rules.

1. Personal information collected on our website

As a general practice, no personal Information is collected about a visitor to the website, apart from the personal information submitted by the visitor himself/herself in a ‘contact us’ form, subscription or various collaboration programs at CCPL. We shall use such Personal Information for the purpose you share it with us. However, at times, certain information may be collected from you when you visit the website. Such information is aggregated to measure the number of visits, average time spent on the website, pages viewed etc. This gives us an idea of which parts of our website users are visiting, in order that we may improve the content to offer you better services. We do not link IP addresses to anything personally identifiable. This means that a user’s session will be tracked, but the user will be anonymous.

2. ID, Customer information for support and maintenance

When you register to use a CCPL product, create an ID with us or use our services for learning or support we collect information that is unique to you and identifies you. This may include your name, email address, phone number or payment information all in accordance with applicable law. Some information is required and other information is optional. Sometimes information regarding eligibility may be required.

3. Information collected while using our online products and applications especially during activation and automatic updates

When our product/application is used information may be collected on how it is used. We may collect information (like an IP address, or the type of device used) that your browser or device typically sends to our servers whenever you use our website, product or application. We may use information that led you to our website – for example the search terms used or the device being used - through cookies and similar technologies. Often this information is anonymous and if associated with you kept strictly confidential. If you do not want us to collect this information, you can tell us by opting out or by either declining or customising cookie settings on our website

4. CCPL emails

We do contact organisations or executives as a part of our marketing campaigns. We do so, as we believe we have legitimate interest to promote our products and services and it also benefits our prospects. We do not do any mass mailing and carefully reach out to selected professionals with a personalised approach. The emails we send you as part of our marketing campaigns allow us to know if you have received or opened the email or clicked a link within the email. If you do not want us to collect this information from marketing emails, you can opt out of receiving such emails by clicking on the unsubscribe button. We have performed a balancing test and have completed our legitimate interest assessment and agreed on using the least intrusive way to reach out to selected data subjects who may be benefited by our offerings.

5. Buttons or tools on our websites related to other companies and social media pages

Our websites may include buttons or tools that link to other companies' services (for example, a Facebook or Google button). We may collect information about your use of these features. In addition, when you see or interact with these buttons, tools, or content, or view a CCPL web page containing them, some information from your browser may automatically be sent to the other company. Please read that company's privacy policy for more information, as these sites may have their own privacy statements in place, which we recommend you review if you visit any linked Web sites. We are not responsible for the content of linked sites or any use of the sites or for the privacy practices of those other Web sites.

We may collect information when you interact with our social networking pages or use the sign-on features.

If you decide to purchase our products or avail our services, our third-party services providers may need to collect certain additional information, like your credit or debit card number and expiration date, bank routing and account number.

6. Device Information. When you are connected to our services via custom applications (apps), we may collect device-specific information such as your device model, operating system, unique device identifiers, and mobile network information. We may associate your unique device identifier or phone number with information that you may have used to register for certain services or purchase products. Server logs that are maintained by us or by our third-party service providers may contain information about the services that you have used, and your device-specific information. We may also maintain digital communication logs that track information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information. We may use your device's IP address or MAC address to track device-event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.

7. Specialized Information. We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches. Certain services may include a unique application number in connection with the installation of apps. This number and information, including, without limitation, operating system type and app version number may be sent to our service providers when you install, update or uninstall apps. We may also collect and process information about your actual location.

At other times, CCPL may collect information that cannot be used to identify you. For example, we may aggregate non-personal information about you and other customers who visit our website. Aggregated information will not contain any information that can be linked directly back to you.

2.2. How We Collect Information

CCPL may use any number of tools to collect information about you, your computer access points, mobile devices, and the web browser that you use to connect to our website or digital applications. For example, "cookies" are text files that we place on your computer or mobile device when you visit our website. We may use cookies to personalize your interactions with our website. You do not have to accept our cookies and you may set your browser to restrict their use and you may delete them after they have been placed on your computer or mobile devices. If you do not accept or delete our cookies, our website may take more time to work, or may not function properly. Effective consent may be provided by using your browser settings, as long as you take positive action. Before using our website, you are advised to check your current browser settings to ensure that the settings reflect your consent for CCPL to place cookies on your devices.

CCPL may also collect additional information from your web browser each time you visit our website. We may collect information about the pages that you visit and the time spent on each web page or area of the website, the promotions or advertisements that you click on, and other actions

that you take while using our website. This information may include your Internet Protocol (“IP”) address, the type of browser, the time that your browser was used to access our website, and the referring web site’s address.

Our Internet service providers may also use other standard web-based technologies to analyze your movements while accessing our website. The technologies include web “beacons,” “pixel tags,” and “clear gifs.” These technologies help us ascertain the effectiveness of our product and service campaigns and marketing programs, allow us to customize the services offered on or through our website, and help determine the best use for our website’ content, and product and service offerings. Some of this information, including the IP address, may be stored on our Internet service provider’s server logs, and may be available for extended periods of time.

Where do we store this data?

Information and data files are stored on our servers and the servers of companies we hire to provide services to us. We use AWS secured platform to store such data and the data is stored with strict security measures. We do not share, sell, or lease any kind of information collected to any third parties for their marketing uses.

2.3. Choice

CCPL allows you to choose (opt-out) whether your information is to be disclosed to a non-related third party for purposes other than CCPL-related communications, business or services. For sensitive personal information, e.g., financial information, CCPL will give individuals the opportunity to explicitly (opt in) consent to the disclosure of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. CCPL shall treat sensitive personal information received from an individual the same as the individual would treat it.

For Users in India. You have the right to withdraw your consent to the use, disclosure or transfer of your information. However, in such event we reserve the right to refuse or limit your access and use of our website and any of their features, including the services offered by us. You also have the right to update or correct your information provided to us and the right to opt out of providing us information. You may exercise such rights by communicating the same to our Privacy/Grievance Officer using the contact details given in this Privacy Policy.

The information contained on our website is for general information purposes only. While we endeavour to keep the information up to date and correct, we make no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability with respect to the website or the information, products, services, or related graphics contained on our website for any purpose. Any reliance you place on such information is therefore strictly at your own risk.

In no event will we be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of, or in connection with, the use of this website. Through this website you are able to link to other websites which are not under the control of CCPL. We have no control over the nature, content or availability of those sites.

The inclusion of any links does not necessarily imply a recommendation or endorse the views expressed within them.

2.4. Use and Disclosure of Your Personal Information

How do we use the information collected?

At times CCPL may use the services of independent companies to provide certain services to you, including, without limitation, website hosting services, credit card processing, product promotions, order processing and shipping services, and visitor surveys. CCPL may share your personal information with the Internet service providers as appropriate under our business models. We do not share personally identifiable information with non-related third parties without your consent, except to the extent necessary to complete your request for products and services offered through our website.

CCPL may use your personal information to contact you via mail, e-mail, landline or mobile device in order to give you updates about CCPL's special events, new services, payment confirmations, current information regarding our products, or other promotions that may be of interest to you. We also use return e-mail addresses to answer the e-mail we receive from you. Your e-mail address will not be shared with non-related third parties for use with their direct marketing programs, other than to comply with applicable laws.

We may also use your IP address, or unique devices identification numbers to help protect CCPL and our Internet service providers from fraud.

Additional uses of your non-personal and personal information will allow us to tailor products and services specific to your needs, to help organize and manage our relationship with you or your business, to conduct business, to provide you with customer and guest support, to perform functions that are described to you at the time of collection, and to enforce our website's Terms. We reserve the right to provide non-personal identifying information, such as aggregate data, to third parties.

We may also use non-personal aggregate information to improve our website. For example, our Internet Service providers may report to us that there were a particular number of visitors to a certain area of our website, or that a certain number of businesses or a certain number of individuals completed our registration forms in particular areas of our website. Such information may also be used to analyze the effectiveness of our business and advertising models.

We may share your information, including personal information and sensitive personal information among our subsidiaries, group companies, affiliates, vendors, suppliers and subcontractors for processing, in order to provide you the best quality of services or for internal reasons, primarily for business and operational purposes. Such subsidiaries, group companies, affiliates, vendors, suppliers and subcontractors may be located within or outside India.

CCPL may also disclose your personal information as is necessary to: (a) comply with a subpoena or court order; (b) cooperate with law enforcement or other government agencies; (c) establish or exercise our legal rights; (d) protect the property or safety of our company and employees, contractors, vendors, suppliers, and customers; (e) defend against legal claims; (f) help with internal and external investigations; or (g) as otherwise required by law or permitted by law. We may disclose your information in connection with the sale or merger of a CCPL or any transaction that involves the sale or assignment of some or all of our assets.

We use this information to:

- To fulfil our contractual commitment and to enhance the performance of our contract with you or controllers who appoint us as processors.
- Allow you use of our products and applications and respond to your requests
- Provide you with the services, support or information requested and monitor effectiveness
- Operate, maintain and add to the features and functionality of our products and services
- Improve our website's user experience and communicate better to engage users
- Enhance the effectiveness of our marketing campaigns. To send marketing emails or messages related to our products and services
- Monitor aggregate metrics to conduct our market research and understand our customers better
- Analyse, diagnose, and fix issues in our product and service offerings.
- To process your job application for an open position.

In all cases this information is not shared with any third party unless explicitly disclosed at the time of collection. It is used by CCPL as above or to prevent/respond to protection of our websites or applications. In some cases like with hosted services, we may share information with those that provide us with technology services (e.g. web hosting and analytics services), but strictly for the purpose of carrying out our work. All such vendors used by us are EU GDPR compliant and have signed a Data protection agreement with CCPL to secure your data. We may be required to share information with law enforcement or other third parties when compelled to do so by court order or other legal process, to comply with statutes or regulations.

If we merge with or are acquired by another company, and if all of our assets are acquired by another company, this information will most likely be one of the assets to be transferred. However, we will not transfer any personal information of our customers until absolutely necessary to provide you with a continuity of service and only when the new owner maintains and provides the same

level of data privacy standards as we do. In such cases, we will provide you with notice and an opportunity to opt-out of the transfer of identifiable data.

2.5. Data Storage and Security

How do we secure information collected?

We understand that the security of your information is vital and have in place strong administrative, technical, and physical security controls and measures to keep data safe and secure. Our privacy practices are designed to provide protection for your personal information, all over the world.

To protect information stored in our servers, through Amazon Web Service infrastructure at various locations like the US, UK and India, access is limited (through user/password credentials and two factor authentication) to those employees who require it to perform their job functions. We use industry-standard Secure Socket Layer (SSL) encryption technology to safeguard the account registration process and sign-up information. Other security safeguards include but are not limited to multifactor authentication, data encryption, firewalls, and physical access controls to building and files.

CCPL implements a variety of security measures to maintain the safety of your personal information when you place an order. CCPL makes reasonable efforts to ensure that our Internet service providers have implemented physical, electronic, and procedural security measures to assist with safeguarding your personal information, and to help protect against unauthorized access and disclosure. Your information collected by us is stored on our systems in India and/or outside the territory of India, by us or our subsidiaries, group companies, affiliates, vendors, suppliers and subcontractors. By providing information to us in any manner including accessing our website, you consent to such storage of information as contemplated herein. Notwithstanding our efforts, the Internet has inherent security risks. CCPL cannot promise, and you should not expect, that your personal information, personal searches, and other communications will always remain secure. You should take care with regard to how you handle and disclose your personal information or any username or password that you are required to use to access services on our website.

We would like to caution our visitors about phishing attacks, wherein unscrupulous third parties seek to extract sensitive and confidential information from you by posing as a genuine website or by sending an email misrepresenting it to be from a genuine source. Please be aware that we never seek sensitive or confidential information such as regarding your financial or health record through emails or through our websites. If you receive such a message claiming to be from CCPL, then please do not reply to it and immediately bring it to our attention by contacting us on dpo@cisocybersecurity.com

CCPL also recognizes the receipt, transmission, or distribution of spam emails (unsolicited bulk emails) as a major concern and has taken reasonable measures, to minimize the transmission and effect of spam emails in its computing environment.

Can this information be reviewed?

In some cases and at our discretion this information may be accessed by respective organizations to correct any mistake in that information, and to delete any information we no longer have business reasons for retaining. You can do this by sending us an email.

CCPL strives to comply with all applicable laws around the globe that are designed to protect your privacy and information, no matter where that information is collected, transferred, or retained. Although legal requirements may vary from country to country, we intend to adhere to the principles set forth in this Privacy Policy even if information is transferred from your country to other countries that may not require an adequate level of protection for your information.

2.6. Children and Data Collection

Our website is directed to be used by adults only and our website's content is not directed toward collecting information from anyone who is under the age of 18 (eighteen). We do not knowingly collect personal information from children or minors. If CCPL or its Internet service providers become aware that a child or minor has provided us with personal information without parental consent, that information will be deleted from our databases. If you have questions about personal information that may have been submitted by a child, please email us at dpo@cisocybersecurity.com or you may also contact our Privacy/Grievance Officer at Phone +91-72

2.7. Rights over your personal data

Under certain circumstances, by law you have the right to:

- Be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from which it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences).
- Object to your personal data being processed for a particular purpose or to request that we stop using your information.
- Request not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.
- Ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible and otherwise required by applicable regulations.
- Withdraw, at any time, any consent that you have previously given to us for our use of your personal data.
- Ask us to stop or start sending you marketing messages at any time.
- 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 and to check that we are lawfully processing it.

- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. 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 working relationship with us.
- Request the erasure of your personal data. This enables you to ask us to delete or remove personal data where you think that we do not have the right to process it.
- Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will provide this information free of charge unless the request is manifestly unfounded or excessive. We will comply with our legal obligations as regards any individual's rights as a data subject.

If you would like to contact us in relation to any of the rights set out above, please contact us by email [dpo@ cisocybersecurity.com](mailto:dpo@cisocybersecurity.com). To protect your privacy and security, we may take reasonable steps to verify your identity before providing you with the details.

2.8. Access to and Modification of the Information Collected

The first time that you provide us with registration information through our website, you may be offered the opportunity to subscribe to and receive additional information about our products and services. After your first use, you can change your initial choices by contacting our customer service e-mail at dpo@cisocybersecurity.com. Each commercial e-mail that we send to you will offer you the opportunity to opt-out of continuing to receive such messages. We may take up to 10 (ten) business days to process your opt-out requests. In some instances, we may have already shared your information with one of our authorized third parties before you changed your information preferences, and you may briefly continue to receive e-mail even after you have opted out. For any grievances related to the use of your personal information or sensitive personal information, you may contact us at:

Privacy/Grievance Officer

Mr. Himesh Yadav
Ciso Cybersecurity Private Limited
The Statesman House, First Floor, Statesman Chambers
148, Barakhamba Road, New Delhi – 110001
Email – Himesh.Yadav@Cisocybersecurity.com

The grievance officer will address your concerns within a month's time perusing the same.

2.9. Data Integrity

CCPL will only process personal information and sensitive personal information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by you.

2.10. Enforcement

CCPL uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, by our privacy principles. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints or disputes regarding the use and disclosure of personal information and sensitive personal information in accordance with the principles.

2.11. General Information and Privacy Support Contact

CCPL may update this Privacy Policy from time to time, and you should take the time to review it each time that you visit our website. By using our website or providing us with personal information or sensitive personal information after we update this Privacy Policy, you agree to this Privacy Policy as revised. CCPL is committed to protecting your personal privacy. If you have questions or comments about our efforts to protect your personal privacy, or if you require additional information CCPL's privacy commitment, please contact our Grievance officer at the below address:

2.12. Right To Complain to The Data Protection Authority

You can contact your regional Data Protection Authority if you have any concerns about how CCPL has handled your personal data and you also have the right to make a complaint at any time to the Data Protection Authority in your region.

Notification of Changes

If we decide to change our privacy policy, we will post those changes on this page so our users are always aware of the information we collect and how we use it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.

Where links are provided to other websites it should be noted that they are not and cannot be governed by our Privacy Statement. We cannot guarantee your privacy when you access other websites through any link provided on this website.

END OF DOCUMENT