KaseSync Privacy Policy

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<th>Latest Revision</th>
<th>Nov 09, 2022</th>
<th>Approver: Yogesh Chauhan</th>
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<td>Reviewer(s): Yogesh Chauhan</td>
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<td>Target Audience</td>
<td>Grazitti Interactive Employees, KaseSync users and customers</td>
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<td>Document Owner</td>
<td>ISG</td>
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<tr>
<td>Document Contact</td>
<td>Yogesh Chauhan, CISO, <a href="mailto:yogeshc@grazitti.com">yogeshc@grazitti.com</a></td>
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DOCUMENT HISTORY

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<td>1.0</td>
<td>Nov 09, 2022</td>
<td>Yogesh Chauhan</td>
<td>CISO</td>
<td>Initial draft</td>
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APPROVERS LIST

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PRIVACY POLICY

Grazitti Interactive ("Grazitti") respects your right to privacy and is committed to the protection of the personal data that you share with us. This Privacy Policy describes how Grazitti's product KaseSync ("KaseSync", "we", "us", or "our") collects, uses, and shares information provided to us through our website www.KaseSync.com (the "Site") and the services available from the use of our product.

We collect information about users of our Service (our “Customers”), as well as our Customers’ end users ("End Users") (collectively, "you", "your", or "yourself"). Note that Customers are also End Users, with access to our products. Some of the information collected may be personal data (defined as personal data of End Users that is processed by KaseSync on behalf of Customers). Your rights regarding personal data are described in this Policy.

By using the service, you agree that your information will be governed as described by this Policy, and that your usage of our website and products with any disputes arising thereof over privacy are subject to this Policy and our Terms of Service ("Terms") which are incorporated by reference into this Policy.

SCOPE OF THIS POLICY

This privacy policy describes the processing of information provided or collected on the Sites where this privacy policy is published, except those products or websites or applications that have a separate privacy statement. This Privacy Policy applies to users of our services anywhere in the world. This notice specifically applies to:

- Users of the Site
- Users using services or KaseSync product

WHAT INFORMATION WE COLLECT

With your usage of our products and services we may collect information which might be classified as Personal Information (defined below). The information we collect, and how that information is used, can vary as per your usage of our products and services.

We collect and store content that you create, fill, submit, post, provide, transmit, save or display in the process of using our product/website. Such content includes any Personal Information or other sensitive information that you choose to include.

- Personal Information – Personally identifiable information is information that identifies you or can be used to identify or contact you. Such information may include your name, address, email address and telephone number. We shall collect personally identifiable information from you voluntarily and only after appropriate consent.
  - We may collect information like business email, contact and other personal identifiable information, where a KaseSync website is used so that we can better understand customer behavior and improve our products, services and advertising.
  - We do not collect any personal information from your browsing of our website. Please refer to our cookie policy to know more information collected during the use of our website.
  - You may request a demo of the KaseSync tool from our site. We shall require your complete name and your business email. You shall have the option to opt in for sharing your information.
  - To use the KaseSync tool and its functionality, you will need to register with us using our Login forms, to be shared as per request and to be filled only after appropriate consent.
● Non-Personal Information – Non-personal information is that which cannot be used to identify or contact you, such as demographic information (like age, profession or gender). Non-personally identifiable information may also include user IP addresses, browser types, domain names, and other anonymous statistical data.
  ○ We may collect information like geolocation and customer activities like most searched/frequently visited pages on our website/product. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.

We do not store any personal information with your use of KaseSync website (https://www.KaseSync.com), but we store the information we collect with unique identifiers tied to the browser, application, or device you’re using. This helps us enhance your browsing experience.

When you’re signed in to the KaseSync product, we collect information that we store with your KaseSync Account, which we treat as personal information and store as per technological and organizational measures outlined under the applicable data privacy laws.

**Information About Payments**

We collect personal information in connection with the purchase of services or products from us. This information includes payment information such as first name, last name, business/personal email address, and billing and contact details.

Note: We do not store credit card details related to any transaction with Grazitti.

**COOKIES, THIRD-PARTY TECHNOLOGIES, AND NEWSLETTERS**

**Cookies**

A cookie is a small piece of data sent from a website and stored on the user’s computer by the user’s web browser while the user is browsing. We collect this information to provide a better user-journey of our website and to enhance the overall experience of our website/products.

**Subscription To Newsletters**

Upon visiting the KaseSync website, users are given the opportunity to subscribe to our enterprise newsletters and regular emails after providing consent. The newsletter may only be received if you have opted in for it. Each newsletter comes with a link providing the user with the option to opt-out of the service. The newsletter contains tracking pixels that provide us the information if and when an e-mail was opened. Such data collected in the tracking pixels are used to analyze and optimize the shipping time of the newsletter and to improve the content of future newsletters as per the interests of the receivers.

**HOW WE USE INFORMATION WE COLLECT**

We may collect your personal/non-personal information when you visit our website, agree to our cookies policy and provide us data in the forms on our website. We also collect information when you provide it to us by requesting for demos/trial/sign-up/attend webinars.

We may use the collected information to provide, operate, maintain, improve, and promote KaseSync services to our clients/visitors. The information may also help you in accessing and using our services including downloading, uploading, content sharing and collaborating.

We may use the information to respond to your requests, questions, queries, and comments; to provide customer support; to send you security alerts and updates. We may also use the information to communicate.
directly with you, in case you do not want to receive any communication from KaseSync, you can opt out any time.

GROUND FOR PROCESSING

Legal Obligations

It may be necessary - by law or as a result of a legal process, or requests from governmental or other legal authorities within or outside your country of work - for us to disclose your personal information. We are obliged to share your personal information under any or all or /all applicable and judicial laws with or /without your consent if we determine that for purposes of disclosure is necessary or appropriate.

Contractual Necessity

We process the following categories of personal data as a matter of "contractual necessity", meaning that we need to process the data to perform under our Terms of Service with you, which enables us to provide you with the services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the services that require such data.

Legitimate Interest

We will only process your personal data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our "legitimate interests" or the legitimate interest of others, as further described below.

- Operation and improvement of our business, products and services
- Personalization of web content on the Service
- Analyzing the use of the services
- Marketing of our products and services
- Provision of customer support
- Protection from fraud or security threats
- Compliance with legal obligations
- Completion of corporate transactions

INFORMATION SHARING AND DISCLOSURE

We only share your personal information with third-party companies as stated in this policy below and strictly for the purpose of employment. However, we may share the information internally within Grazitti departments. We may use your data for marketing purposes and the same shall be informed and express consent would be obtained. We make certain personal information available to strategic partners that work with us. Personal information will only be shared by us with these companies in order to provide or improve the offering of our products and services; it will not be shared with third parties for their own marketing purposes without your prior express consent.

Sharing Your Information With Other Entities

1. Affiliates

We may share personal information with all Grazitti affiliates. For the purposes of this Privacy Statement, two entities are "Affiliates" if both of the entities are controlled/owned 50% or more by the same owner(s).
2. Service Providers

Grazitti is in contract with third-party auditing companies and may make available some information during external audits, to show its compliance with the applicable law(s). These companies are obligated to protect your information. All the information shall be provided on a need to know basis and for only the specific purpose.

3. Legal Compliance And Security

It may be necessary - by law or as a result of a legal process, or requests from public or governmental authorities within or outside your country of residence - for us to disclose your personal information.

We are obliged to share your personal information under any/all applicable and judicial laws with/without your consent if we determine that for purposes of disclosure is necessary or appropriate.

Note: Grazitti does not sell your personal information.

DATA SECURITY, INTEGRITY, AND RETENTION

Grazitti is compliant to ISO27001:2013, PIMS, and HIPAA. The security, integrity, and confidentiality of your information are extremely important to us. To ensure the safety of your information we have implemented reasonable, technical, administrative, and physical security measures. Considering the potential risks to data, we conduct VAPT from third-party and perform regular internal/external audits. Where applicable the below scenarios:

- If you use a third party cloud server to host our product and have all the access with you then, responsibility for securing storage and access to the information you put into the services rests with you and not Grazitti Interactive.
- If you use a third party cloud server to host our product and take our product support services only then, the responsibility for the product lies with us. But securing the data, server access, the data storage and server maintenance rests with you and your hosting company.
- If you use a third party cloud server to host our product and take our services to manage the server then, the responsibility for securing the server credentials and access to the information lies with us.
- If you use our products hosted on a server managed by us then, it's Grazitti's responsibility to implement the security measures to keep your data secured.

If you feel that the security of your personal information has been compromised, please contact us immediately at privacy@grazitti.com. Please be aware that, despite our best efforts, no security system is impenetrable. In the event of a security breach, we will promptly notify you and the proper authorities if required by law.

Please check the Grazitti security & compliance page for more details.

Other Sites

The services may contain links to other websites or services. We are not responsible for the privacy practices or the content of such websites or services, and you should review the privacy policy of each such website or service to make sure that you are comfortable with it before providing any personal data. As discussed above, we do not receive any banking information you provide to our third party payment processors, and all such information is subject to their privacy policies.
Data Retention and Deletion

We will store the data acquired from you for a predetermined period. You have the right to request for data erasure at any time with reference to point (c) under your rights. The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the initiation/fulfillment of the contract.

In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes, or is otherwise permitted or required by applicable law, rule or regulation.

YOUR RIGHTS ON YOUR INFORMATION

You have certain rights with respect to your personal data, including those set forth below. For more information about these rights, or to submit a request, please email privacy@grazitti.com with the subject of the email clearly identifying the purpose of the email. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include personal data, if necessary to verify your identity and the nature of your request. You also have the option to opt-out for any/all services.

- **Right of Access:** You can request more information about the personal data we hold about you and request a copy of such personal data. Furthermore, you have a right to obtain information as to whether personal data is transferred to a third country or to an international organization. Where this is the case, you have the right to be informed of the appropriate safeguards relating to the transfer.

- **Right to Rectification:** If you believe that any personal data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.

- **Right to Erasure:** You can request that we erase some or all of your personal data from our systems. You have the right to request the erasure of your personal data where one of the following grounds applies:
  - The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.
  - The data subject objects to the processing and there are no overriding legitimate grounds for the processing.
  - The personal data has been unlawfully processed.

If one of the aforementioned reasons applies, and you wish to request the erasure of personal data stored by us, you may request the same.

- **Withdrawal of Consent:** If we are processing your personal data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time and in accordance with this privacy policy. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your personal data, if such use or disclosure is necessary to enable you to utilize some or all of our services.

- **Right of Portability:** You can ask for a copy of your personal data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
Right to Object: You can contact us to let us know that you object to the further use or disclosure of your personal data for certain purposes, such as for direct marketing purposes. You have the right to object to the processing of your personal data. We will no longer process your personal data in the event of the objection being raised unless we can demonstrate compelling legitimate grounds for the processing.

Right to Restrict Processing: You can ask us to restrict further processing of your personal data.

Right to File Complaint: You have the right to lodge a complaint about KaseSync’s practices with respect to your personal data with the supervisory authority.

EU Resident's Rights

If you are a European resident, GDPR provides consumers (Europe residents) with specific rights regarding their personal information. To make such a request, you may contact us at privacy@grazitti.com and include "GDPR Rights Request" in the subject line of the request to exercise your rights under the applicable data privacy law(s). We will do our best to respond to your inquiries within 30 days.

California Resident's Rights

If you are a California resident, CCPA provides consumers (California residents) with specific rights regarding their personal information. To make such a request, you may contact us at privacy@grazitti.com and include "California Privacy Rights Request" in the subject line of the request to exercise your rights under the applicable data privacy law(s). We will do our best to respond to your inquiries within 30 days.

Other Rights

You may reside in a country not covered by the above privacy laws. In such cases, we have put in place the appropriate measures to ensure that your personal data will be secure according to the laws of the country in which you reside. To make such a request, you may contact us at privacy@grazitti.com and include the privacy law of the country of your residence in the subject line of the request to exercise your rights under the applicable data privacy law(s). We will do our best to respond to your inquiries within 30 days. If you require further information about these protective measures, you can request it from our Data Protection Officer (see contacts below) or send an email to privacy@grazitti.com.

COPYRIGHT NOTICE

All aspects of our website(s) – design, text, graphics, forms, underlying source code, and all other literary and artistic aspects – are copyright of Grazitti and its affiliates.

In accessing these web pages, you agree that any downloading of content is for non-commercial and non-transferrable reference only. No part of this website or services may be copied in any form or by any means without prior Grazitti permission.

POLICY UPDATES

Grazitti reserves the right to modify or update this privacy statement periodically to keep pace with new technologies, industry practices, and regulatory requirements. All the changes are expected to be minor and will be updated on our website with immediate effect. Therefore, we encourage you to read our policy regularly for any recent updates. If any fundamental changes are introduced which are bound to significantly affect your rights, the same shall be communicated to you via an appropriate platform or forum.
If you have any questions or queries related to our Privacy Statement, please feel free to contact us at privacy@grazitti.com.

**HOW TO CONTACT US**

Grazitti has a designated Data Protection Officer, who shall act as the point of contact for clients, customers, and individuals to ensure their data safety and security. If you have any questions regarding this Privacy Statement or its implementation, you may email the Data Protection Officer at dpo@grazitti.com. You may also write to us at:

**Attn: Data Protection Officer**
Grazitti Interactive  
Plot 198, Phase 2  
Industrial Area, Panchkula, Haryana (India)  
Phone: +91 172 504 8500  
Email: dpo@grazitti.com  
Website: [https://www.grazitti.com](https://www.grazitti.com)