

# **Privacy Policy**

# **Applicability**

The following Privacy Policy governs the online information collection practices of CedCommerce an entity of Cedcoss Technologies Private Limited ("CedCommerce", "we", "us", "our"). It outlines the types of information that we gather about you while you are using our website <a href="https://cedcommerce.com/">https://cedcommerce.com/</a> and the ways in which we use this information.

CedCommerce users who have created accounts ("User(s)") to share their content such as information, files and folders ("Content") to analyse their pre-existing customers, prospective customers and third parties ("Viewer(s)") on the basis of the content viewed by them. The viewers are the non-registered users of the web-services and product offerings ("Service(s)") provided by CedCommerce. We process your data in accordance with the applicable laws and regulations following industry best practices.

#### **PURPOSE AND SCOPE**

The Privacy Policy applies primarily to information that we collect online; however, it may apply to some of the data that you provide to us offline and/or through other means, as well (for example, via telephone, or through the mail).

The Privacy Policy documents and describes the manner in which our organisation collects information from all our Users/Viewers of our Services. While providing our Services on behalf of our registered users, we collect information related to Viewers. The use of information collected on behalf of our Users is governed primarily by our contract for the engagement with them and the privacy policies governing their organization. We are not accountable for the privacy policies and practices undertaken by our users or any other third parties.

## **HOW WE COLLECT DATA ABOUT YOU**

We may collect different data from or about you depending on how you use the Sites.

#### Data provided by registered users:

	When you create an account or login into your account, we
Account creation and login	collect personal information such as first name, last name,
	email address and password.

#### Data provided by non-registered users:

Access pre-existing user's content	When you request to view a pre-existing User's content the user may ask for personal information such as email address in order to open a CedCommerce' link. CedCommerce collects and stores this personal information on behalf of its Users.  When you provide this personal information, you do so in accordance with that User's privacy practices and policies. CedCommerce is not responsible for the privacy practices of its Users, and only processes this information in accordance with the applicable agreement it has with each User. For any issues pertaining to processing of such personal information, users can contact CedCommerce.
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# Data collected through automated means:

System data	Technical data about your computer or device, like device type, operation system and the IP address. This data helps us improve the delivery of our web pages and to measure traffic on the Site.
	The collection of data will also depend on the individual settings of your device and software. It is recommended to refer to the policies of your device manufacturer or software provider to learn about information they might share with us.

#### **User Generated Data:**

	We collect information and material (user generated content) provided to us voluntarily by our users or the viewers to
Account Creation, Login and	publish and process on our platform.
Usage as a viewer	The user generated content is inclusive of text, photos & videos associated with the accounts/ emails used to create an
	account with CedCommerce or to access links as viewers.

#### **Data Collected from Third Parties:**

Integration of Third Parties such as Google Drive, OneDrive, Dropbox, Box	When you connect your existing cloud storage such as Google Drive, we access your account on your behalf to get information about your files & folders. When you choose to create a Google Drive file link in CedCommerce, we download the selected file(s) from your Google Drive and store it in our own storage for reliability purposes.
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## **Data collected during transactions:**

Transactional Data	On the basis of types of services requested, CedCommerce also collects information such as:  1. type of service that has been requested 2. order details for such a request 3. payment & transaction information (such as merchant's name, payment method, chargeable amount for the service) 4. date and time the service was provided
	For the purpose of promotion codes, name of the person associated with such a code will also be collected

Some information is collected through the use of cookies, web beacons and tracking technologies. Please refer to the Cookie Policy for more details on the type of cookies being used.

# THE TYPES OF INFORMATION WE COLLECT AND STORE

We may collect personal and sensitive personal information about you and store this information in connection with the provision and fulfilment of our services to you. Personal information may include:

- First name and last name
- Email address



- Location
- IP Address

#### HOW WE USE YOUR PERSONAL INFORMATION

The above personal information may be used for the following purposes:

- To provide you with information about our offerings and/or our periodic newsletters;
- To respond to your requests;
- For creation or development of business intelligence or data analytics in relation to the Offerings provided by us (for this purpose we may share the Personal Information with certain software or tools available online);
- To manage our relationship with you;
- For internal record keeping;
- To provide you with authorization to login and use your user account:
- To verify your identity;
- To maintain correct and up-to-date information about you;
- To identify you as a contracting party:
- To improve our website;
- To enable automated handling of the subscriptions;
- To otherwise be able to provide the services to you and
- To comply with our legal or statutory obligations.

#### WHO HAS ACCESS TO YOUR DATA WITHIN OUR ORGANIZATION?

Within our organization, access to your data is limited to those persons who require access in order to provide you with the Products and Services, which you purchase from us, to contact you, and to respond to your inquiries, including requests for refund. Those staff members may be on teams such as: marketing, events, development, executive, customer support. Employees only have access to data that is relevant to their team, on a 'need to know' basis.

#### WHO DO WE SHARE YOUR DATA WITH OUTSIDE OUR ORGANIZATION AND WHY?

#### **Processors**

We may use service providers & third parties for operating and improving the Sites, to assist with certain functions, such as payment processing, email transmission, conducting surveys or contests, data hosting, managing our ads, third-party solutions for marketing and analytics, and some aspects of our technical and customer support. We take measures to ensure that these service providers access, process, and store information about you only for the purposes we authorize, through the execution of Data Processing Agreements or Addenda.

#### **Authorities**

We may access, preserve, and disclose information about you to third parties, including the content of messages if we believe disclosure is in accordance with or required by, applicable law, regulation, legal process, or audits. We may also disclose information about you if we believe that your actions are inconsistent with our Terms of Service or related guidelines and policies, or if necessary to protect the rights, property, or safety of, or prevent fraud or abuse of, Company or others.

#### **Transfer of business**

If we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, personal information could be one of the assets transferred to or acquired by a third party.

#### WHY AND FOR HOW LONG DO WE STORE INFORMATION WE COLLECT FROM YOU?

We retain certain information collected from you while you are a member on the Site, and in certain cases where you have deleted your account, for the following reasons:



- So that you can use our Sites;
- To ensure that we do not communicate with you if you have asked us not to;
- To provide you with a refund, if entitled;
- To better understand the traffic to our Sites so that we can provide all members with the best possible experience;
- To detect and prevent abuse of our Sites, illegal activities and breaches of our Terms of Service; and
- To comply with applicable legal, tax or accounting requirements.

We retain user data for as long as necessary for the purposes described above. This means that we retain different categories of data for different periods of time depending on the type of data, the category of user to whom the data relates to, and the purposes for which we collected the data.

#### **SECURITY**

We implement a variety of administrative, managerial, and technical security measures to help protect your personal information. Our Company has various internal control standards which relate specifically to the handling of personal information. These include certain controls to help safeguard the information we collect online. Our employees are trained to understand and comply with these controls and we communicate our Privacy Policy practices and guidelines to our employees. However, while we strive to protect your personal information, you must also take steps to protect your information. We urge you to take every precaution to protect your personal information while you are on the Internet.

#### YOUR RIGHTS UNDER THE GDPR

You have certain rights if you are within the EU this includes:

- **Right to access.** This right allows you to obtain a copy of your personal data, as well as other supplementary information.
- **Right to restrict processing.** You have the right to restrict the processing of your personal data in certain circumstances.
- **Right to rectification.** You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to object to processing.** The right to object allows you to stop or prevent us from processing your personal data. This right exists where we are relying on a legitimate interest as the legal basis for processing your Personal Data. You also have the right to object where we are processing your Personal data for direct marketing purposes.
- Right to erasure. You have the right to ask us to delete or remove Personal data when the
  personal data is no longer necessary for the purpose which you originally collected or
  processed.

To exercise your rights, you can contact us at dpo@CedCommerce.com

#### CALIFORNIA RESIDENTS HAVE CERTAIN RIGHTS UNDER THE GDPR

Users who are California residents have certain rights under the General Data Protection Regulation, ("GDPR") included in these rights are:

Right to know. You have the right to request to know more about the categories and specific
pieces of personal information that we have collected about you and access a copy of your
personal information.



- **Right to deletion.** You have the right to request deletion of personal information that we have collected about you.
- **Right to non-discrimination.** If you choose to exercise any of your rights under GDPR, we will treat you like all other users. In other words, there is no penalty for exercising your rights under GDPR.
- Right to opt-out. You have the right to opt-out of the sale of your personal information. We do not sell personal information. However, the Service Providers we partner with (for example, our advertising partners) may use technology on the Service that "sells" personal information as defined by the GDPR. If you wish to opt-out of the use of your personal information for interest-based advertising purposes and these potential sales as defined under GDPR law, you may do so by following the instructions below. Please note that any opt out is specific to the browser you use. You may need to opt out on every browser that you use.

To exercise any of these rights under GDPR, please email dpo@CedCommerce.com . To know more about your rights and how to exercise them visit our Data Subject Request Policy.

#### **OUR POLICY CONCERNING CHILDREN & THEIR DATA**

Our Sites are not directed to children under the age of sixteen and we do not knowingly collect personally identifiable information from children or distribute such information to third parties. We screen users who wish to provide personal information in order to prevent children from providing such information. If we become aware that we have inadvertently received personally identifiable information from a child, we will delete such information from our records. If we change our practices in the future, we will obtain prior, verifiable parental consent before collecting any personally identifiable information from children.

#### **LINKS TO OTHER WEBSITES**

Our Sites may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

Third parties are under no obligation to comply with this Privacy Policy with respect to Personal Data that you provide directly to those third parties or that those third parties collect for themselves. We do not control the third-party sites that may be accessible through our Services. Thus, this Privacy Policy does not apply to information you provide to third-party sites or gathered by the third parties that operate them.

#### **CHANGES TO THIS POLICY**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. If we make any material change/s to the Policy, we will notify you via email, through a notification posted on the Services, or as required by applicable law. You can see when the Policy was last updated by checking the date at the bottom of this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective from when they are posted on this page.

#### **CONTACT US**

If you have any questions about this Privacy Policy, you can contact us at dpo@CedCommerce.com

Last Updated: 22-06-2023