

#### PRIVACY POLICY FOR THE WEBSITES OF THE ARCL ORGANICS LIMITED

Thank you for visiting our website of The ARCL Organics Limited. We respect your privacy and consider it an important element of our business. This policy describes the information that we collect from you when you download, access or use its website or mobile applications for delivery of information, products, offerings and content via any mobile or internet connected device or otherwise.

#### User consent

By using services of the websites of <u>ARCL Organics Limited</u> you agree and provide consent to our collection, use and sharing of your personal information as described in this policy.

### **Personal Information Collected**

We collect personal information from you only if you provide it voluntarily. The type of personally identifiable information that may be collected by us includes and is not limited to, name, address, e-mail address and information about your interests in and use of various services.

### **Collection of Information by Third-Party Sites and Sponsors**

Our website(s) sometimes contain links to other websites whose privacy policies may be different to ours. Visitors should consult the other sites' privacy notices as we have no control over information that is submitted to, or collected by, these third parties.

#### **Information Collected and Stored Automatically**

If you visit our website(s) just to browse, read pages or product information, but do not register, we gather and store certain information about your visit automatically. This information cannot and does not identify you personally.

The kind of information that is gathered automatically include the type of browser you are using (e.g., Netscape, Internet Explorer), the type of Operating System you are using (e.g., Windows '98 or Mac OS) and the domain name of your Internet Service Provider (e.g., America Online, Satyam Online, Mantra Online, VSNL), the date and time of your visit and the pages you visit, along with geographical information such as Country, Region or City, etc.

### Log File Information

We automatically collect limited information about your computer's connection to the Internet, mobile number, including your IP address, when you visit our site, application or service. Your IP address is a number that lets computers attached to the Internet know where to send you data — such as the pages you view. We automatically receive and log information from your browser, including your IP address, your computer's name, your operating system, browser type and version, CPU speed, and connection speed. We may also collect log information from your device, including your location, IP address, your device's name, device's serial number or unique identification number (e.g. UDiD on your iOS device), your device operating system, browser type and version, CPU speed, and connection speed, etc.



#### **Clear GIFs**

We may use "clear GIFs" (Web Beacons) to track the online usage patterns of our Users in an anonymous manner, without personally identifying the User. We may also use clear GIFs in HTML-based emails sent to our Users to track which emails are opened by recipients. We use this information to inter-alia deliver our web pages to you upon request, to tailor our Sites or Service to the interests of our users, to measure traffic within our Sites to improve the quality, functionality and interactivity of our Sites and let advertisers know the geographic locations from where our Users come without personally identifying the Users.

### **Data Erasure**

We retain your personal information as long as necessary for Us to provide services to you or you ask Us to not retain your data. If you no longer want Us to use your information then you can request that we erase your personal information and close your services account as soon as reasonably possible, based on your account activity and in accordance with applicable law(s).

#### Information from other Sources

We may receive information about you from other sources, add it to our account information and treat it in accordance with this Policy. If you provide information to the platform provider or other partner, whom we provide services to, your account information and order information may be passed on to us.

#### Demographic and other information

We may reference other sources of demographic and other information in order to provide you with more targeted communications and promotions.

## Links to third party sites/ ad-servers

The Sites may include links to other websites or applications. Such websites or applications are governed by their respective privacy policies, which are beyond our control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the application you are visiting. That privacy policy may differ from ours. If you can't find the privacy policy of any of these sites via a link from the application's homepage, you should contact the application owners directly for more information.

## Information use by the company

The information as supplied by the users enables us to improve the Services and provide you the most user-friendly experience. In some cases, /provision of certain service(s) or utility(ies), we may require your contact address as well. All required Information is service dependent, and the Company may use the above said user Information to, maintain, protect, and improve the Services (including advertising and personalisation on the Sites) and for developing new services. We may also use your email address or other personally identifiable information to send commercial or marketing messages about our Services and/or such additional updates and features about our products and services.



Any personally identifiable information provided by you will not be considered as sensitive if it is freely available and / or accessible in the public domain like any comments, messages, blogs, scribbles available on social platforms like Facebook, Twitter, etc.

Any posted/uploaded/conveyed/communicated by users on the public sections of the Sites becomes published content and is not considered personally identifiable information subject to this Policy.

### **Information Sharing**

The Company shares your Information with any third party without obtaining the prior consent of the User in the following limited circumstances:

- 1. When it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including but not limited to cyber incidents, or for prosecution and punishment of offences. These disclosures are made in good faith and belief that such disclosure is reasonably necessary for enforcing these Terms or for complying with the applicable laws and regulations.
- 2. The Company proposes to share such Information to conduct its business and to share such Information within its group companies and officers and employees of such group companies for the purpose of processing personal information on its behalf. We also ensure that these recipients of such Information agree to process such information based on our instructions and in compliance with this Policy and any other appropriate confidentiality and security measures.
- 3. The Company may present Information to our advertisers and third parties to help them understand our audience and confirm the value of advertising on our Sites however it is usually in the form of aggregated statistics on traffic to various pages within our site.
- 4. The Company may share your Information regarding your activities on Sites with third party social websites to populate your social wall that is visible to other people however you will have an option to set your privacy settings, where you can decide what you would like to share or not to share with others.
- 5. We may share your Information to enforce or protect our rights or any or all of its affiliates, associates, employees, directors or officers or when we have reason to believe that disclosing Information of User(s) is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights or our Sites, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

### Accessing and updating personal information

When you use the Services or Sites (or any of its sub sites), we make good faith efforts to provide you, as and when requested by you, with access to your personal information and shall further ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient shall be corrected or amended as feasible, subject to any requirement for such personal information or sensitive personal data or information to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely



impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case, where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Because of the way we maintain certain services and/or due to requirements under applicable laws for retaining or preserving information, after you delete your information, such information and/or residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

### Information security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data. All information gathered on the websites of ARCL Organics Limited is securely stored within the Company controlled database. The database is stored on servers secured behind a firewall; access to the servers is password-protected and is strictly limited. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. And, of course, any information you include in a posting to the discussion areas is available to anyone with Internet access.

# **Updated/changes**

The internet is an ever-evolving medium. We may alter our Policy from time to time to incorporate necessary changes in technology, applicable law or any other variant. In any case, we reserve the right to change (at any point of time) the terms of this Policy or the Terms of Use. Any changes we make will be effective immediately on notice, which we may give by posting the new policy on the Sites. Your use of the Sites or Services after such notice will be deemed acceptance of such changes. We may also make reasonable efforts to inform you via electronic mail. In any case, you are advised to review this Policy periodically on the sites to ensure that you are aware of the latest version.

Purpose for collecting, processing and disclosing your personal information

We use information to provide, analyse, administer, enhance and personalize Our service and marketing efforts, to process your registration, to provide you services, and to communicate with you related to the below-mentioned points.

### **Questions/ Grievances Redressals**

Redressal Mechanism: Any complaints, abuse or concerns with regards to the processing of information provided by you or breach of these terms shall be immediately informed to the designated Grievance Officer as mentioned below via in writing or through email signed with the electronic signature to grievance officer.

Mr. Subhankar Paul
Company Secretary and Compliance officer.



**ARCL Organics Limited** 

Rampur, P.S. Maheshtala

Budge Budge Trunk Road,

Kolkata - 700141

Email- legal@arcl.in

We request you to please provide the following information in your complaint:

- 1. Full name along with postal residential address, email id and cell number
- 2. Self-attested photocopy or scanned copy of Government issued photo-identity
- 3. Clear Statement as to whether the information is personal or sensitive personal information
- 4. Specify what supporting documents if any are relied upon and attached clear readable scanned copies thereof. If you rely on a court order, please ensure the scan is of a certified copy. The Court, case number and the Judge passing the order should be clearly visible.
- 5. A signed declaration that whatever information and/or documents are submitted with the complaint are true, complete and current in all respects and nothing therein is false.
- 6. A statement, under penalty of perjury, that the information in the notice is accurate, and that the information being complained about belongs to you.
- 7. You may also contact us in case you have any questions/ suggestions about the Privacy Policy using the contact information mentioned above.

Please note that a complaint must be from someone personally and directly affected by the matter which forms the subject matter of the complaint. It must not be vexatious, trivial or argumentative. Please do not send daily reminders.

The company shall not be responsible for any communication, if addressed, to any non-designated person in this regard.