



CYBER SECURITY AND DATA PRIVACY POLICY

INTRODUCTION

CCL Products (India) Limited is a company incorporated under the laws of India, having its registered office at Duggirala, Guntur-522330, Andhra Pradesh. [Hereinafter referred to as “We” or “Us” or “Company” or “The Company”].

In accordance with all applicable laws, “The Company” has created this Privacy Policy [Hereinafter referred to as “Privacy Policy” or “Policy” or “Privacy Statement”] in order to demonstrate “The Company’s” privacy commitment to any individual whose data “The Company” collects, stores or processes for providing or offering its services and products.

DEFINITIONS

Agent: Any individual or entity which has a contractual relationship with “The Company”, where “The Company” is the principal and the other individual or entity is the agent, shall hereinafter be referred to as an “Agent”. For instance, The Company’s distributors, dealers, CFA, contractors, etc. shall be considered Agents.

Data Subject: All individuals whose personal information is either collected, received, processed, stored, dealt or handled by “The Company” shall hereinafter be referred to as “Data Subject”.

Information: Personal Information of a Data Subject collected by “The Company” under this Policy shall hereinafter be referred to as “Information”. Such Information includes, inter alia, Sensitive Personal Data or Information as defined under the Indian Information Technology Act, 2000 and the Aadhaar number and/or the biometric information associated with an Aadhaar number.

Third-Party: Any individual or entity over which “The Company” does not have any control or ownership, and which operates independently on its own is hereinafter referred to as a “Third Party”.

GOVERNING LAW

“The Company” is an organization based and existing in India and is thus bound by the laws of the Republic of India. This Privacy Policy has been prepared in accordance with applicable Indian laws, including the Indian Information Technology Act, 2000 and the Aadhaar [Targeted Delivery of Financial and other Subsidies, Benefits and Services] Act, 2016.

APPLICABILITY

This Policy applies to all individuals whose Information is either collected, received, processed, stored, dealt or handled by “The Company”.



OBJECTIVE

This Privacy Policy is intended to inform the Data Subject on how “The Company” collects, processes, stores, and uses personal information that a Data Subject provides to “The Company” either directly or indirectly. This Privacy Policy also covers “The Company’s treatment of any personal information that Third Parties share with “The Company”.

HOW “The Company” COLLECTS DATA SUBJECT’S INFORMATION

“The Company” collects Information about Data Subject through the following means:

Whenever a Data Subject shows an interest or elects to use “The Company’s services or products, including information about “The Company” schemes, irrespective of whether such services/products are provided directly by “The Company” or by its Agents on “The Company’s” behalf.

Through “The Company’s” network of Agents and a Third Party which collects such Information and transfers it to “The Company” for a business requirement.

When Data Subject downloads “The Company’s” mobile applications or visits any of the websites owned by “The Company” and/or creates an account on the mobile applications or the websites.

When Data Subject, which also includes employees of “The Company”, directly elects to share their Information with “The Company”.

WHY “The Company” COLLECTS DATA SUBJECT’S INFORMATION [PURPOSE]

“The Company” uses Information to conduct its business and to provide Data Subject with the best possible services/products. “The Company” will only use the Information based on this Privacy Policy, its understanding with the Data Subject, or as required by law.

- a) “The Company” will collect adequate, relevant and necessary Information and will process such Information fairly and lawfully for the purpose it is collected. Most commonly, “The Company” will use the Information in the following circumstances:
- b) Where “The Company” needs to perform the obligations it has promised the Data Subject, such as to provide a service or product to the Data Subject and to enable the Data Subject’s use of “The Company’s” products/services, including but not limited to dealing with enquiries and complaints made by or about the Data Subject relating to services/products provided by “The Company” and to improve and customize “The Company’s” services/products in accordance with the Data Subject’s preferences;
- c) Where “The Company” needs to comply with a legal, accounting, business or reporting obligation, including compliance with requests from the Government of India or any Governmental Agency;
- d) To send marketing as well as non-marketing commercial communications to the Data Subject;
- e) To send the Data Subject notifications that the Data Subject has specifically requested for as well as to send statements, invoices and payment reminders to the Data Subject, and to collect payments from the Data Subject;
- f) To provide Third Parties with statistical information about its customers but those Third Parties will not be able to identify any individual from that information;
- g) To keep “The Company’s” website, mobile applications and other systems secure and to prevent fraud;



“The Company” collects and processes the Information only when it is essential to offer its services/products to the Data Subject. By providing his or her Information, the Data Subject agrees that “The Company” may collect, use and share this Information with Third Parties for the purposes mentioned above from [a] to [g].

FAILURE TO PROVIDE INFORMATION

“The Company” may not be able to perform the obligations it has promised the Data Subject, or “The Company” may be prevented from complying with its legal, accounting, business or reporting obligations if the Data Subject fails to provide certain Information when requested by “The Company”.

“The Company” shall not be held liable in any manner whatsoever if “The Company” is unable to perform its services or if there is a deficiency in “The Company’s” services to the Data Subject due to Data Subject’s failure to provide such Information.

“The Company” and/or its Agents, employees, directors, associates, etc. shall be indemnified by the Data Subject and held harmless from any complaints, legal proceedings or claims filed or initiated by the Data Subject or any Third Party against “The Company” in this regard.

CHANGE OF PURPOSE

“The Company” will only use Data Subject’s Information for the purposes for which “The Company” collected it, unless “The Company” reasonably considers that it needs to use it for another reason and that reason is compatible with the original purpose.

CONSENT

Data Subject agrees that “The Company” does not need any additional or further consent from him/her to use the Data Subject’s Information in accordance with this Policy to carry out “The Company”’s legal obligations or exercise specific rights.

INFORMATION SHARING AND DISCLOSURE

“The Company” may disclose the Information to any of its Agents or Third Parties insofar as reasonably necessary for the purposes set out in this Policy and for the purpose of providing services/products to the Data Subject.

Such Agents and Third Parties are expected to provide a similar level of protection to the Information as is adhered to by “The Company”.

In addition to this, “The Company” may disclose the Information where it is required to do so by law or to Governmental Agencies.



TRANSFER OF INFORMATION OUTSIDE INDIA

Unless stated otherwise, "The Company" stores and processes the Information in India. There may, however, be occasions when "The Company" needs to transfer the Information outside India for its business requirements. In such instances, "The Company" will exercise the same level of care in handling the Information as it does in India.

DATA SECURITY

The Information is processed by "The Company" in strict accordance with the Indian Information Technology Act, 2000, and the rules notified thereunder. "The Company" implements and maintain 'Reasonable Security Practices and Procedures' as stated in the Indian Information Technology Act, 2000 and the Information Technology [Reasonable Security Practices and Procedures and Sensitive Personal Data or Information] Rules, 2011, while processing, collecting, storing or handling any Information.

DATA RETENTION

"The Company" will only retain the Information for as long as necessary to fulfil the purposes "The Company" collected it for, including for the purposes of satisfying any legal, business, accounting, or reporting requirements.

In some circumstances, "The Company" may anonymize the Information so that it can no longer be associated with the Data Subject, in which case "The Company" may use such information without a further reference to Data Subject.

WHO HANDLES AND RETAINS DATA SUBJECT'S INFORMATION

Details about the primary entity which handles and retains the Information is provided below:

"The Company" having its registered office at:

Sy No 28/P16 of Agra village and Sy No 85/P6 of B.M Kaval Village Kengeri Hobli Bangalore-560082.

REVIEW OF INFORMATION

Data Subject can contact "The Company", through the Grievance Officer whose details are provided at the end of the Policy, requesting access to Data Subject's Information for reviewing or requesting amendment to certain information that Data Subject considers to be incorrect or wrong. "The Company" shall process such requests from Data Subject in accordance with applicable law.

"The Company" shall not be responsible for the authenticity of the Information provided by the Data Subject to "The Company" or its Agents.



WITHDRAWAL OF CONSENT

Data Subject may at any time revoke or withdraw Data Subject's consent to provide Information to "The Company" by contacting the Grievance Officer whose details are provided at the end of the Policy. However, such action may render it difficult for "The Company" to offer some of its services/products to the Data Subject any further.

"The Company" shall not be held liable in any manner whatsoever if "The Company" is unable to perform its services or if there is a deficiency in its services to Data Subject due to Data Subject's withdrawal of consent.

"The Company" and/or its Agents, employees, directors, associates, etc. shall be indemnified by the Data Subject and held harmless from any complaints, legal proceedings or claims filed or initiated by the Data Subject or any Third Party against "The Company" in this regard.

CHANGES TO THIS PRIVACY POLICY

The Policy is subject to modifications from time to time. If "The Company" decides to change this Policy, "The Company" shall publish the modified Policy on its website.

GRIEVANCE OFFICER

In accordance with the Indian Information Technology Act 2000 and the rules notified thereunder, the contact details of the Grievance Officer are provided below:

Sandeep Meka
Head-IT
Email: sandeep.m@continental.coffee