

## **InsightsFirst – Privacy Policy**

Evalueserve and its affiliated companies (Evalueserve, us, we, or our) value and appreciate the trust that users of InsightsFirst (“User”) place in us to protect and store their personal information carefully and in accordance with applicable laws.

This privacy policy explains how Evalueserve collects and stores information that identifies and relates to Users (“Personal Information”) and how we use, disclose, and protect such information.

Evalueserve will act as a controller or its equivalent under privacy laws, where we decide the purpose and means of processing personal data. However, where we act as per specific written instructions from our client, we act as the data processors, or its equivalent under privacy laws. In such cases, the client is the data controller or its equivalent for that personal information, and we assist the relevant data controller in complying with the data privacy requirements.

By using InsightsFirst and accessing / using services herein, Users confirm their agreement with the latest terms of this policy. If a User does not agree with the terms of this policy, they must stop using InsightsFirst immediately.

### **Data subjects and types of personal information**

We collect personal data from:

- i) clients and their employee
- ii) Suppliers,
- iii) business contacts, and
- iv) Users
- v) Anyone accessing InsightsFirst.

This data may be gathered either via online mode or offline. If the data we collect is not listed in this privacy policy, we will give individuals appropriate privacy notice (as required by law) about the data collected and its planned usage.

Below are the types of personal information that we may collect from Users (without limitation):

- **Personal details:** All types of identifiers and contact details including but not limited to name, pronoun, email, phone numbers, fax details, physical address, gender, date of birth, age, and place of birth.
- **Commercial information:** History and records of InsightsFirst that Users obtained from Evalueserve. Correspondence between Users and Evalueserve when it is sent to a dedicated e-mail id or via electronic communication means (including channels supported by artificial intelligence).
- **Marketing information:** Identifiers such as name, physical address, IP address, social media handle, other online identifiers (email address, etc.), or mobile number if used for direct marketing.
- **Audio-visual and electronic materials: including but not limited to** photographs / images, footage recorded on CCTV or other audio, CD, pen drive, hard-disk or video captured as part of security or monitoring systems.

### **Methods of collecting personal information**

- **Information provided directly by User**
  1. **Contact us page:** We collect personal information through the Contact us page and use it to get back to the User in response to their request.
  2. **Use of InsightsFirst:** We collect personal information that Users provide when they use InsightsFirst to subscribe to the services offered by Evalueserve.
  3. **Email communication:** When a User sends us an email, we may collect personal information that they freely supply to us.
  4. **Information from other sources:** We collect personal information when a User voluntarily uploads information, completes customer surveys, provides feedback, or applies for a job opportunity at Evalueserve.
- **Information collected indirectly**

1. **Marketing communications:** If a User receives our marketing communications, we will track when (s)he receives, opens, or shares the link received from Evalueserve. To unsubscribe from marketing communications, Users should refer to [Usage of personal information for marketing purposes](#).

2. **Other sources:**

- Depending upon the engagement or association with us, we may receive information about Users from other sources, including but not limited to vendors, clients, insurance providers, auditors, travel service providers, consulting firms, background check service providers, and social media.
- Obtaining personal information from public sources such as freely or paid databases, including public content on social media websites, to make initial contact with a relevant individual at a client or other company.
- Personal information gathered from external sources will be used only in compliance with consent requirements or other lawful basis of processing.

**Purpose of and legal basis for processing personal data**

Evalueserve has defined the legal basis for processing personal information, which includes but is not limited to the below points:

Purpose	Legal Basis
Contractual obligations	To perform contractual obligations agreed in our agreement and to provide services to the User
Legal and regulatory requirements	To comply with the necessary legal and regulatory requirements and obligations and court orders, or to exercise legal claims for or defend legal claims against the company
Public interest	To perform tasks in public interest as set out in the law
Managing business operations including the provision of our services to clients and their customers	To ensure the proper functioning of our business operations
Performing data analytics	To ensure the proper functioning of our business operations

Marketing our products or services to Users (unless the User objected against such processing, as further described in How do we use personal data for marketing purposes below)	To ensure the proper functioning of our business operations
Improving the security and functioning of InsightsFirst and networks	To ensure proper administration of InsightsFirst and monitor our systems to mitigate possible security incidents
(For audio or video captured during): Informing interested stakeholders about the content of live or recorded events (including virtual events or webinars) or	To process information that Users have explicitly consented to provide before the
their recordings, including online publication of such recordings for marketing purposes	event (a User can revoke their consent at any time)
User information	To store and process information that Users have explicitly agreed to share to enable the correct functioning of our business operations

### Usage of your personal information

Personal information may be used for purposes including but not limited to those provided below:

- **For Evalueserve purpose**
  - Facilitating the usage of and personalizing the User experience on InsightsFirst.
  - Sending important information regarding InsightsFirst, Evalueserve's terms and conditions, policies, and / or other administrative information.
  - Helping Users to address technical and other problems with InsightsFirst.
  - Proper administration of InsightsFirst.
  - Improving our services and the content of InsightsFirst.
  - Protecting the integrity of InsightsFirst.
- **For other purposes**
  - Recording, supporting, and facilitating the provision of services that Users purchase from us.
  - Responding to User inquiries or fulfilling User requests for information about our services.
  - Providing Users with information about Evalueserve's services and sending information and

materials from Evalueserve.

- Detecting and preventing identity theft, fraud, and other potentially illegal acts.
- Responding to subpoenas, court orders, or judicial processes.
- Providing information to law enforcement agencies or in connection with an investigation or complaint.
- Resolving disputes and troubleshooting problems.
- Providing Users with relevant information or services that they request from us or that we feel may interest them based on previous interactions where they have consented to be contacted.

### **Restriction on sensitive Personal Information**

Unless we specifically request for information to comply with applicable laws, we ask Users to not send or disclose to us any sensitive personal information (e.g., social security numbers, passport numbers, racial or ethnic origin, political opinions, religious or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through InsightsFirst or otherwise to us.

### **Duration of retention of personal information**

We will retain personal information only for as long as necessary for the purposes for which it was collected. We maintain specific retention policies and procedures, as per which personal information is deleted after a reasonable time according to the following criteria:

- We will retain User information till we have an ongoing relationship with the User.
- We will only keep the data while the User's account is active or for as long as needed to provide services to the User.
- We will retain User information for as long as needed to comply with our applicable legal and contractual obligations.

### **Disclosure of personal information to third parties**

- We may disclose personal information to our marketing agency for running our marketing campaigns.
- Our external IT supplier may have access to personal information, but access will be restricted only to the purposes of delivering their services to us.
- We may share personal Information with companies that may manage and / or administer surveys and / or competitions on our behalf, some of which may be based outside the jurisdiction of the region or country where Evalueserve operates.
- We may share Users' personal information with our appointed third parties.
- We may disclose personal information to companies within the Evalueserve group if they are carrying out services for us.
- We may disclose any personal information we hold about Users, if necessary, in connection with any investigation or complaint in relation to the use of InsightsFirst, or to identify, contact, or bring legal action against someone who may (either intentionally or unintentionally) be causing injury to or interference with any person's rights or property (including of Users of InsightsFirst).
- We may disclose any information to comply with applicable laws, regulations, legal processes, governmental requests, or for fraud prevention or detection.
- When you visit InsightsFirst, cookies and similar technologies may be used by our online data partners or vendors to associate these activities with other personal information they or others have about you, including by association with your email or home address. We (or service providers on our behalf) may then send communications and marketing to these email or home addresses. You may opt out of receiving this advertising by visiting <https://app.retention.com/optout>

## Usage of personal information for marketing purposes

- We may send relevant and insightful information to Users about our products and services and those of other companies in our group that may be of interest to them, based on previous interactions. Users may unsubscribe from receiving such information at any time.
- The personal information we collect and use for marketing purposes relates to individual employees of our clients and other companies with whom we have or had existing business relationships.
- We may obtain contact information from public sources such as freely or paid databases, including public content on social media websites, to make initial contact with a relevant individual at a client or other company.
- Users have the right, at any time, to stop receiving marketing communications.
- If a User no longer wishes to be contacted for marketing purposes, they should inform us.

Please note that if a User exercises the right to discontinue marketing communications from Evalueserve by using 'Opt-out', we may retain the minimum personal information necessary to record that the User opted out and to avoid contacting the User again.

## User's rights regarding personal information

- **Right to be informed:** Users are entitled to know whether we hold their personal information and the purpose it is processed for.
- **Right of access:** Users are entitled to obtain a copy of their personal information, together with an explanation of the categories of data being processed, the purposes of such processing, and the details of third parties to whom the data may have been disclosed.
- **Right to rectification:** Users are entitled to correct or update their personal information available with us.
- **Right to erasure:** Users are entitled to get their data erased from our records, including customer relationship management (CRM) databases.
- **Right to data portability:** Users are entitled to obtain and reuse their personal information. They can either obtain the information from us and provide it to a third party or ask us to transfer your personal information directly to a third party.
- **Right to object to and / or restrict processing:** Users have the right to object to and / or restrict the processing or sharing of their data in some circumstances, including where the data is inaccurate (for the period during which we are verifying the data), no longer required in light of the purpose of processing or connection with direct marketing.
- **Right to complain and obtain redressal:** Users have the right to lodge a complaint with the competent supervisory authority to obtain redressal, and where appropriate, compensation for a breach of the applicable data protection regulation.
- **Right to withdraw:** Users have right to withdraw their consent provided at any time by contacting us.

In the above cases, we will retain the minimum personal information to note that the User opted out from being contacted again.

To exercise any of the above-mentioned rights, please contact us at [dp@evalueserve.com](mailto:dp@evalueserve.com)

## Automated profiling and decision-making

We may use automated profiling in limited circumstances relating to email campaigns. As part of such campaigns, we will track whenever Users receive, open, click a link in, or share an email from us using any of our automated solutions. These solution profile the information tracked to evaluate User interest in our service offerings or promotions. This enables us to identify and target potential customers or business partners and to provide Users with relevant and timely content based on User interests.

## **Cookies**

When a User visits InsightsFirst, Evalueserve's servers (which may be hosted by a third-party service provider) may collect information indirectly and automatically about their activities on InsightsFirst. We will use this information and the cookies as described in our Cookies Policy available at [Cookie Policy | Evalueserve](#). All reference to 'InsightsFirst' in the Cookies Policy shall be read as reference to 'InsightsFirst' for this purpose of this InsightsFirst.

The data from the cookie(s) may be used by Evalueserve to track visitors' use of InsightsFirst and to compile statistical reports on InsightsFirst activity.

A User can set their browser to not accept cookies. If a User chooses to disable cookies, they may not be able to fully experience all the features of InsightsFirst, and parts of InsightsFirst may become non-functional or inaccessible.

### **Keeping personal information accurate and up to date**

- Users can always choose to not provide personal information. However, if personal information is required (mandatory) for a certain service, feature, or content on InsightsFirst, they may not be able to access it unless they provide that data.
- Users can access, add to or update their personal information at any time, and we would ask them to ensure that this information is up to date on a regular basis. When Users update the information, Evalueserve will keep a copy of the prior version, where necessary, for its records.

### **Location of processing personal information**

- We may share personal information with companies within the Evalueserve group to carry out their services and to send you marketing communications from across the globe, except where prohibited by applicable laws. Safeguards are put in place under applicable data protection laws to ensure the legitimate transfer of data between regions.
- We may transfer personal information to third parties for providing services, including surveys and marketing activities.

### **Transferring personal information**

We transfer personal data between our group companies and data centers for the purposes described above. Your personal data will be stored in databases located in regions across the globe. The databases are controlled by our administrative staff located outside of the European Union or UK and can be accessed electronically. Where we transfer personal data within Evalueserve entities or to third parties located in other countries, we ensure such countries provide an adequate level of protection as determined by the appropriate authorities or use alternative safeguards including the execution of standard contractual clauses.

We reserve the right to transfer information, including personal information, to a third party in the event of the sale, merger, liquidation, receivership, or transfer of all or substantially all of our assets, provided the third party agrees to adhere to the terms of this privacy policy and only uses personal information for the purpose that Users have provided it to us.

### **User age restriction**

InsightsFirst is not directed at persons under the age of 18 and, therefore, such persons are not permitted to view and / or register with InsightsFirst. Users must be aged 18 years or above to use InsightsFirst and post and / or upload any material to it. Any person who is using InsightsFirst represents and warrants that they are 18 years of age or older. We cannot – and we are not required to – verify the age of Users of InsightsFirst. We hereby notify Users that by posting any material on InsightsFirst, they confirm that they are over the age of 18. If a person is using InsightsFirst as a representative of a company or other entity, (Users represent that they have the authority to confirm acceptance of this privacy policy on behalf of such company or entity.

### **Security controls**

Evalueserve holds an ISO 27001:2022 certification, and this international standard defines the requirements for an Information Security Management System (ISMS). Evalueserve's processes and security controls provide an effective framework for protecting our clients' and our business information, including personal information.

We maintain organizational and technical measures for all the personal data we hold. We have protocols, controls, and relevant policies; procedures; and guidelines to maintain these controls, considering the risks associated with the categories of personal data and the processing we undertake.

We adopt security measures in line with industry standards to protect personal information. We have implemented security safeguards – such as HTTPS – that ensure the protection of personal information. We regularly monitor our systems to mitigate possible vulnerabilities and attacks. However, we cannot guarantee or warrant the security of any information transmitted via InsightsFirst.

### **Changes to the privacy policy**

We take all reasonable efforts to keep this policy up to date. Please check this privacy policy page periodically to stay informed of any changes. We reserve the right to modify or supplement this privacy policy; however, the changes will always comply with the prevailing data protection laws.

### **Links to other sites**

We provide links to other websites for User convenience and information. These sites may have their own privacy policies in place. We recommend Users review these policies if they visit any linked websites. We are not responsible for the content of linked sites, any use of the sites or their privacy practices. This privacy statement applies solely to information collected by this site.

### **Disclaimer:**

We may change, modify, add to, or delete portions of this policy at any time, and the date for the most recent update will appear at the top of the policy. However, please note that it is the responsibility of the User to regularly review the policy.