

Privacy Policy for NuSummit Technologies Private Limited and its Subsidiaries

Last updated on 19th December 2024.

About the Organization:

NUSUMMIT is a digital-native technology company that engineers world-class solutions to help our global customers accelerate their digital transformation journeys. Our headquarters is situated in Mumbai, Maharashtra, and we provide our services through our website: <https://www.NuSummit.com/>. To learn more about us and our business activity, please contact us at erm.compliance@nusummit.com

NUSUMMIT, its subsidiaries, and its branch operations, hereinafter referred to as 'NUSUMMIT' 'we,' 'us', or 'our' is committed to respecting your privacy and choices. The privacy policy (hereinafter "Privacy Policy" or "Policy") highlights our privacy practices regarding Personal Information that we collect and process in compliance with applicable data privacy regulations.

1. Objective:

This policy has been framed with an intention to be transparent with our data subject in terms of the data we collect and process.

The policy also focuses on the data collected and processed through our websites, that link to this Privacy Policy, which include our official website <https://www.nusummit.com/> and their sub-domains (Collectively referred to as "NUSUMMIT Websites") and is extended to any of our processing activities that post a link or reference to this policy.

Depending on the purposes of processing and your relationship with us as a data subject, we may provide additional customized privacy policy.

The scope of this policy covers the categories of personal data collected, how we use or process such data, who are the recipients of such data, and your associated rights under applicable laws including how to exercise the same. The applicability of the Privacy Policy is global, however certain additional information may be relevant to you depending on the country where you reside. We recommend that you read this Privacy Policy in full to ensure you are fully informed. If you have any questions about this Privacy Policy or about data collection, use, and disclosure practices, please contact us at erm.compliance@nusummit.com

Our customers are the controller of 'Customer Data'. NUSUMMIT is the processor of 'Customer Data' and the controller of 'Other Data'.

2. Personal Information that we process:

We may collect the following categories of Personal Information:

- Information collected as part of your visit and usage of our websites, such as Internet Protocol (IP) address, demographics, your computers' operating system, device information, telemetry data and browser type and information collected via cookies or similar tracking technologies.
- Personal and Contact details, such as, Name, title, e-mail address, phone numbers, address, designation, Company/Organization, Industry, Location (in terms of City/Country), LinkedIn profiles/URLs (or similar professional data set).

- Login credentials, such as Username when you register for any of our applicable services.
- Audio-Visual information such as photographs or images captured, video recordings (if enabled), when attending any of our events, webinars etc.
- Queries, comments, or feedback as submitted by you, including any correspondence you have made with us.
- Preferences relating to marketing communications, interest areas, subscription details, dietary preferences/allergies (in relation to events we may organize).
- Additionally, we may collect certain data points based on the categories of individuals (data subjects) and their relationship with us.

3. Sources of Personal Information:

We may collect the Personal Information through various sources, such as mentioned below:

- Submitted by yourself, through our website forms, applications on our portals, or by contacting/emailing our official contacts.
- Shared to NUSUMMIT employees, such as our sales or marketing representatives.
- Shared with or by NUSUMMIT' affiliates.
- Shared by the employers of the visitors and contractors, where applicable.
- Sourced from public websites and social media, including your publicly accessible profiles.
- Shared by our suppliers, vendors, and service providers.
- Sourced via Cookies and similar tracking technologies as deployed on our website (details are available in the Cookie Policy and can be accessed here: (<https://www.nusummit.com/cookie-policy/>)).

4. Data collected from third party:

In connection with the services provided by NUSUMMIT, NUSUMMIT may receive, store and/or process Personal Data on behalf of third parties including Clients, Business Partners, Vendors, Contractors, Consultants, Service Providers and Advisors. In such cases, NUSUMMIT will process such Personal Data pursuant to the terms of any contracts with such third parties and will inform you from which source the personal data originate, and if applicable, whether it came from publicly accessible sources.

5. Use of your Personal Information:

We may use your Personal Information for the following purposes:

- to provide better usability, troubleshooting and site maintenance
- to understand which parts of the website are visited and how frequently
- to create your login credentials, where applicable
- to identify you once you register on our website
- to facilitate communication with you, including contacting you and responding to your queries or requests

- to provide access to desirable content based on your preferences
- To enable marketing and sales-related communications and related purposes
- to know your interest in participation
- as a participant of any competitions and/or award ceremonies organized by us, to publish your name and corresponding details to make them available to larger audience on the Internet (including details of awards won); for the jury members and other associated delegates and speakers, to publish their name, title, photograph, and bio in a similar manner
- to invite you for events, seminars and equivalent ceremonies organized by us and related purposes such as running marketing or promotional campaigns, including such promotions or publications on social media
- to publish testimonials and case studies
- to generate and maintain leads as part of our Customer Relationship Management database
- to perform data analytics for providing a better user experience, enhance website performance and achieve business objectives
- to enhance and optimize our business operations, applications, systems, and processes, including operation and management of our communication assets and systems, ensuring and strengthening information security, maintenance of audit trail and associated records,
- to protect your data and NUSUMMIT assets from information security threats and to secure against any unauthorized access, disclosure, alteration, or destruction
- to comply with applicable laws and other legal requirements, such as regulatory filings, record-keeping and reporting obligations, cooperating with government-authorized inspections or requests, protecting our legal rights, and seeking remedies, including defending against any claims or engaging in legal proceedings, responding to subpoenas or court orders and managing documentation for related purposes

6. Cookies:

For the purposes of the Services, we use automated data collection tools such as Cookies to collect certain information. "Cookies" are small text files that are placed on your hard drive by a Web server when you access our Services.

The categories of cookies used are

- **Necessary cookies:** These cookies are needed to run our website, keep it secure, and comply with regulations that apply to us.
- **Analytics cookies:** We may use analytics cookies on our website. We may use both session Cookies and persistent Cookies to identify that you have logged in to the Services and to tell us how and when you interact with our Services. We may also use Cookies to monitor aggregate usage and web traffic routing on our Services and to customize and improve our Services. Unlike persistent Cookies, session Cookies are deleted when you log off from the Services and close your browser

- **Marketing Cookies:** We may use cookies storage required to create user profiles to send advertising, or to track the user on a website or across several websites for similar marketing purposes.

You have the option of blocking or not allowing cookies, which is provided for by our cookie banner asking you which type of cookie you wish to enable.

For more details about how we use these technologies, please see our [Cookie Policy](#).

7. Legal basis of the processing:

The applicable privacy and data protection laws provide for certain justifiable grounds for collection and processing of personal data, commonly referred to as the legal basis of processing. We primarily rely on the following legal bases:

- **Consent:** We process your data only if you have given your consent freely for the same. Where you have consented to a particular processing, you have a right to withdraw the consent at any time. You may withdraw consent by contacting us with a request using the details set out in the “Contact Information” section below.
- **Contractual necessity:** We process your personal data only when it is necessary for the performance of a contract. For example, if the processing is necessary in order to fulfill our commitments under the applicable terms of service.
- **Legal Obligation:** We process your data only if the use of your information is necessary for compliance with a legal obligation.
- **Legitimate Interest:** We process your Personal Information when it is necessary for the purposes of a legitimate interest pursued by us or a third party (when these interests are not overridden by your data protection rights), which may include:
 - Providing you the services you requested
 - Communicating information about products or services
 - Offering opportunities to become our Personnel
 - Responding to requests · Tracking compliance with the Terms and Conditions of Use of our website.
 - Analyzing the characteristics of visitors to our website, including applicants and clients/prospective clients
 - Improving the services, we offer.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact information provided in the “Contact Information” section below.

8. Consequences of not providing Personal Information:

If you choose not to provide your Personal Information that is mandatory to process your request, we may not be able to fulfill the relevant purpose of processing, including provision of any services to you, if applicable.

9. Data recipients, transfer, and disclosure of Personal Information:

9.1 NUSUMMIT does not share your Personal Information with third parties for their direct marketing purposes.

We share your Personal Information within

- NUSUMMIT or any of its subsidiaries;
- Business partners;
- Service providers;
- Authorized third-party agents; or
- Auditors, and/or government authorities, where applicable.

9.2 Legal Requirement:

We provide your personal data when we are required to provide such information in response to a court order or other applicable laws or legal processes.

9.3 If we have consent:

We may share and disclose information with your consent or at your direction. Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time. Please contact us using the details in the 'Contact information' section of this notice.

9.4 Third-Party vendors:

NUSUMMIT provides your personal data to third parties such as our IT providers, services providers, etc who provide services such as information processing, extending credit, fulfilling customer orders, delivering products to you, managing and enhancing customer data, providing customer service, assessing your interest in our Products and services, and conducting customer research or satisfaction surveys. These companies are obligated to protect your information as required by any applicable privacy and security law.

9.5 Third Party Plugins:

- **Ad blocker detection and Evasion:**

NUSUMMIT website uses Ad blocker detection on the website to enhance user experience and maintain site functionality.

- **Analytics Remarketing:**

Our website uses Google Analytics and Microsoft Clarity for analytics and remarketing purposes to analyze site usage and enhance user experience.

- **Ad trackers:**

Our website uses ad trackers to monitor and improve advertising effectiveness. We use various third-party WordPress plugins to enhance user experience.

- **Canvas Fingerprinting:**

Our website uses canvas fingerprinting technology to help enhance security, prevent fraud, and improve user experience. This technique collects data about your device's graphics rendering capabilities to create a unique identifier

We use Canvas Fingerprinting for the following:

1. **Fraud Prevention:** To detect and prevent fraudulent activities by identifying and tracking suspicious behaviour.
 2. **User Analytics:** To improve website functionality and understand user interactions by tracking visits and behaviour patterns.
 3. **Personalization:** To offer personalized content or services based on the user's device and browsing patterns.
- **Pixel tracking technologies:**

Our website uses pixel-tracking technologies to monitor and analyze user interactions, measure the effectiveness of our marketing efforts, and improve site performance. Our website uses platforms like Microsoft Clarity & Google Analytics.

- Top of Form
- Bottom of Form
- **Video tracking technologies:**

Our website uses video tracking technology to collect data on user interactions with embedded videos from services such as Vimeo and YouTube. This includes tracking metrics such as play, pause, and completion rates to enhance content delivery and analyze viewer engagement.

- **Keystroke captures technologies:**

Our website uses keystroke capture technologies to analyze user inputs for the purpose of improving user experience and detecting errors. This technology tracks the keys you type while interacting with forms on our site

- **Session replay technologies:**

Our website uses session replay technologies provided by Microsoft Clarity/Google Analytics to record and analyze user interactions, including mouse movements, clicks, scrolling, and keystrokes, to enhance site functionality and user experience.

9.6 Tax Authorities:

Relevant tax, payments, and customs authorities, who may pass this on to tax authorities in other jurisdictions. The tax regulations require us to collect information about each investor's tax residency.

9.7 To prevent fraud and protect rights:

We believe that the disclosure is necessary to prevent or respond to fraud, defend our websites against attacks, or protect the property and safety of NUSUMMIT and users, or the public.

9.8 To Comply with Laws:

If we receive a request for information, it may be necessary by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence for us to disclose your Personal Information. We may also disclose information about you if we determine that for purposes of legal compliance with any applicable privacy and data protection requirement, national security, law enforcement, or other issues of public importance, disclosure is necessary or

appropriate. We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all Personal Information we collect to the relevant third party

10. Data security:

NUSUMMIT adopts reasonable and appropriate security controls, practices and procedures including administrative, physical security, and technical controls in order to safeguard your Personal Information.

11. Cross-Border Data Transfers

Your Personal Information may be transferred to and maintained on, computers located outside of your state, province, country, or other governmental jurisdiction where the privacy laws are different from the laws of your country and may not be as protective as those in your jurisdiction.

These international transfers of your personal information are made pursuant to the appropriate safeguards such as the standard data protection clauses adopted by the European Commission. These clauses are contractual commitments between parties transferring personal data (for example, between NUSUMMIT and its Clients, suppliers, or data processors outside the EU), binding them to protect the privacy and security of the data.

12. Data retention:

We retain Personal Data where we have an existing legally binding agreement/consent from you to avail/provide services from/to you. We store your Personal Information for different time periods depending on the category of Personal Information and the nature of relationship that you have with us. We determine how long we need Personal Information on a case-by-case basis, but our goal is to keep your Personal Information for as short a period as possible to achieve the purpose for which Personal Information is collected. We consider the following criteria when we are making decisions on how long we will retain your Personal Information:

- The category of Personal Information.
- Whether the Personal Information is typically deleted based on specific schedules, such as marketing information.
- Whether the Personal Information is necessary to operate or provide our services. For example, account information may be retained for a longer period of time based on the agreement you have with us.
- How long we need to retain the Personal Information to comply with our legal obligations.
- Our legitimate interests or legal purposes, such as network improvement, fraud prevention, record-keeping, promoting safety, security and integrity, or enforcing our legal rights.
- The retention of your Personal Data shall be governed by the Data Retention Policy of NUSUMMIT.

13. Your Rights:

Data Subjects have certain rights in respect of their personal data. The rights given with respect to your personal data include:

- **The Right to Access:**You have the right to access personal data and supplementary information. You can ask us for a copy of your personal information.
- **The Right to Rectification:**You can ask us to change, update, or fix your data in certain cases, particularly if it is inaccurate.
- **The Right to Erasure:**You can ask us to erase or delete all or some of your personal information (e.g., if it is no longer necessary to provide Services to you) without undue delay.
- **The Right to Restriction of Processing:**You can ask us to stop using all or some of your personal information (e.g., if we have no legal right to keep using it) or limiting our use of it (e.g. if you think your personal information is inaccurate or unlawfully held).
- **The Right to Data Portability:**You have the right to data portability, which provides the right to receive your personal data in a structured, commonly used, and machine-readable format, and have the right to transmit the same to another controller.
- **The Right to Object:**You have the right to object to the processing of personal data.
- **Automated individual decision-making**, including profiling: You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you (data subject).
- **The right to withdraw consent:**You have the right to withdraw your consent at any time with effect for the future. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.
- **The right to lodge a complaint:**You have the right to lodge a complaint with the supervisory authority if you are dissatisfied with the way we handle or process your personal data.

Whenever you use our services, we aim to provide you with easy means to access, modify, delete, object to or restrict the use of your personal information.

We strive to give you ways to access, update/modify your data quickly or delete it unless we have to keep that information for legal purposes. These rights can be exercised by contacting us using the details in the “Contact Information” section below.

14. Children’s Privacy:

NUSUMMIT Websites, its associated products or services, and hosted contents are not intended for the use of children under the age of 16.

As such, we do not knowingly solicit or collect personally identifiable information online from children without prior verifiable parental consent. If NUSUMMIT learns that a child has submitted personally identifiable information online without parental consent, it will take all reasonable measures to delete such information from its databases and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law). If you become aware of any personally identifiable information we have collected from children, please email us at erm.compliance@nusummit.com

15. Linked websites:

Our privacy practices regarding Personal Information that we collect and store about you through our portals such as Recruitment and Global Alumni will be as per the privacy policy of those portals.

NUSUMMIT provides links to third-party websites and services. However, NUSUMMIT is not responsible for the privacy policy, practices, or the contents of such third-party websites.

16. Notice Based on the Jurisdiction:

16.1. For Indian Users:

16.1.1 Lawful Purpose for Processing

- **Consent:** We process your data only if you have given your consent freely for the same. You may withdraw consent by contacting us with a request using the details set out in the "Contact Information" section below.
- **Legal Obligation:** We process your data only if the use of your information is necessary for compliance with a legal obligation.
- **Legitimate Uses:** We process your data on the grounds of legitimate uses, where you voluntarily provide us your data for example to provide our services, and for purposes of employment. Our privacy practices regarding Personal Information that we collect and store about you through our portals such as Recruitment will be as per the privacy policy of those portals.

16.1.2 Our Policy Towards Children

Our Services are not directed to children under 18 and we do not knowingly collect Personal Data from children under 18. If we learn that we have collected the Personal Data of a child under 16 we will take steps to delete such information from our files as soon as possible.

16.1.3 International Transfer

Your Personal Data may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction.

These international transfers of your personal information are made pursuant to the appropriate safeguards.

16.1.4 Your Rights

Data Principals have certain rights in respect of their personal data. The rights given with respect to your personal data include:

- **The Right of Access:** You have the right to access personal data and supplementary information. You can ask us for a copy of your personal information.
- **The Right to Correction:** You can ask us to change, update, or fix your data in certain cases, particularly if it's inaccurate.
- **The Right to Erasure:** You can ask us to erase or delete all or some of your personal information (e.g., if it is no longer necessary to provide Services to you) without undue delay.
- **The right to file a complaint:** You have the right to file a complaint with the Data Protection Board if you are dissatisfied with the way we handle or process your personal data.

Whenever you use our services, we aim to provide you with easy means to access, modify or erase your personal information.

We strive to give you ways to access, update/modify your data quickly, or delete it unless we have to keep that information for legal purposes. These rights can be exercised by contacting us using the details set out in the "**Contact Information**" section below.

16.1.5 Nomination

The Digital Personal Data Protection Act, 2023 provides data principals with a right to nominate a person on their behalf to exercise their rights and to ensure safeguarding the personal data.

This right can be exercised in the event of the data principal's death or incapacity. To exercise your Right to Nomination you may contact us at erm.compliance@nusummit.com

16.1.6 Grievance Redressal

You have a right to grievance redressal under the Digital Personal Data Protection Act, 2023. We wish to resolve your grievances amicably. If you have any grievances regarding the processing of your personal data or your rights regarding the personal data, you may raise your grievances at erm.compliance@nusummit.com .

Complaints can also sent to the whistleblower email ID : whistleblower@nusummit.com

17. How to contact us:

If you have any questions regarding our privacy practices or this Privacy Policy, or to request this Privacy Policy in another format, please contact us at:

Contact Person: Pritish Arun Nadkarni – Head of Enterprise Risk Management at NuSummit Group

Office Address: NuSummit Technologies Pvt Ltd , Trade Globe, Ground Floor, J.B Nagar, Andheri – Kurla Road, Andheri (E), Mumbai – 400 059 India

Email: erm.compliance@nusummit.com and prish.nadkarni@nusummit.com

18. Updates to this privacy Policy:

NUSUMMIT may change the data privacy practices and update this Privacy policy as and when the need arises, and the same will be made available on the website. However, our commitment to protecting the privacy of website users will continue to be.