



Privacy Policy

We at Constl, (**Constl, Company, we, our, us**) take privacy concerns very seriously and are committed to ensuring that our handling of personally identifiable information complies with applicable data protection and privacy laws and related regulations. This Privacy Policy sets out our policies and practices regarding the collection, processing, use, storage and disposal of information that we collect from and about any of our customers that may be “personally identifiable.” This includes any information (other than publicly listed information) by which you can be individually identified, including but not limited to name, mailing and/or billing address, email address, and phone number, and any other such information. This Privacy Policy also outlines the steps that you can take to further protect any personally identifiable information that you may provide to us and how you may contact us about privacy issues.

By agreeing to this Privacy Policy, you represent that you shall not access our Services by means of any mechanism or technology which conceals your actual geo-location or provides incorrect details of your location, (for example, use a virtual private network (VPN) to access our Services. We shall not be responsible or liable for any processing or collection of your information if you use these mechanisms to access our Platforms and Services.

This policy is global, applying to all Constl locations. It applies to personal information regardless of format. For example, the policy applies to computerized records and electronic information as well as paper-based files.

It is also applicable to all personal information that is collected, maintained, or processed by Constl. The concepts enumerated in this policy will guide Constl’ selection and expectations of its clients, partners, agents and/or contractors to whom Constl transfers and relies on for processing of personal information.

Constl provides the technology platform for hosted or “cloud” unified communications as a service offering. These Products merely act as a conduit for data transmitted by third parties and Subscribers. Constl processes personal information that is controlled by or originated from other companies, such as our Clients or other business partners. Constl also processes personal information while providing support for Constl communications products. Constl shall protect the personal information, comply with all laws that regulate the processing of such personal information, and process the information only as authorized by the data controller or the data subject. Accordingly, Constl relies on guidance and direction of the Client (as the data controller), who determines the purposes of processing such personal information. In some cases, Constl may collect and process personal information for our own business purposes and shall comply with the applicable privacy laws concerning Constl processing.

While Constl does process data in its role of providing a technology platform, it does not own, control or direct the use of any of the personal information stored or processed by any Client or Subscriber. Constl only processes such personal information to provide and invoice for purchased and/or subscribed Products and Services.

INFORMATION WE MAY COLLECT FROM YOU

1.1. We may collect and process the following data about you:



Privacy Policy

1.1.1. Information that you provide by filling in forms on our site. This includes information provided at the time of registering to use our site, subscribing to our services, requesting, applying for or entering further services (including, but not limited to, a competition or promotion), making an enquiry or reporting a problem. This may include, but is not limited to, information such as your name, address, phone and email address.

1.1.2. In order to improve our communications with you as well as improve our products and services, we may ask you to provide us with additional information about you such as your professional interests and your experiences with us as well as more detailed contact preferences. When you provide us with any personal information you consent to us collecting and using that information according to your preferences.

1.1.3. If you contact us, we may keep a record of that correspondence.

1.1.4. We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

1.1.5. Details of transactions you carry out through our site and of the fulfilment of your orders.

1.1.6. Details of your visits to our site and the resources that you access and/or download.

PURPOSE LIMITATION

Constl will collect, use or disclose personal data supplied by you online only for the purposes disclosed to you, unless the disclosure:

- is a use of the personal data for any additional purpose that is directly related to the original purpose for which the personal data was collected,
- is necessary to prepare, negotiate and perform a contract with you,
- is required by law or the competent governmental or judicial authorities,
- is necessary to establish or preserve a legal claim or defense,
- is necessary to prevent fraud or other illegal activities, such as willful attacks on Constl's information technology systems.

ACCIDENTAL INFORMATION DISCLOSURE

Constl is aware that we are not all perfect and that it may be possible to unintentionally send an email to the wrong person. We have added the following disclaimer to the bottom of each email we send:

The information contained within or attached to this communication is confidential and is intended solely for the use of the individual to whom it is addressed. Any quoted prices are ex-GST and subject to change at Constl's discretion. Any views or opinions expressed are solely those of the author and do not necessarily represent those of Constl. If you are not the intended recipient of this email, you are hereby notified that any disclosure, copying, distribution, or acting in reliance of the contents of this information



Privacy Policy

is strictly prohibited and may be unlawful. Please contact the sender if you believe you have received this email in error.

Non-Personal Data Collected Automatically

When you access our website, we may automatically (i.e., not by registration) collect non-personal data (e.g., type of Internet browser and operating system used, the domain name of the website from which you came, number of visits, average time spent on the site, pages viewed). We may use this data and share it with our associates to monitor the attractiveness of our website and improve its performance or content.

“Cookies” – Information Stored Automatically on Your Computer

When you view our website, we may store some data on your computer in the form of a “cookie” to automatically recognize your PC next time you visit. Cookies can help us in many ways, for example, by allowing us to tailor a website to better match your interests or to store your password to save you having to re-enter it each time. If you do not wish to receive cookies, please configure your Internet browser to erase all cookies from your computer’s hard drive, block all cookies or receive a warning before a cookie is stored.

RIGHT TO MODIFY OR TERMINATE

Constl reserves the right at any time to modify or discontinue, temporarily or permanently, the services (or any part of it), with or without notice. Constl, in its sole discretion, reserves the right to terminate any user account and refuse any current or future use of the platform for any reason at any time by giving any prior notice if such usage is in contravention of the applicable law. Such termination may result in the deactivation or deletion of the account and the loss of all the content hosted therein.

Where do We disclose your Personal Information:

In order to deliver the services, you require, Constl may disclose your personal information, to the extent required only, to the below illustrative agencies/organizations outside of Constl. Your personal information is disclosed to these agencies/organizations only in relation to the services being provided to you and/or in connection with improvisation of services through innovations:

- Affiliates
- Marketing and Sales
- Business associates/business partners/ agents, who are contractually associated with us for providing service to us or to our customers, either directly or indirectly
- Third Party Service Providers
- Customer enquiries
- Mailing operations
- Billing and debt-recovery functions

Privacy Policy

- Information technology services
- Installation, maintenance, and repair services
- Market research
- Web site usage analysis. Constl takes reasonable steps to ensure that these organizations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.
- Sharing Aggregated and De-Identified Information. We may use your personal data to create aggregated and anonymized information which we may share with third parties. Nobody can identify you from that anonymized information. In other circumstances we may pseudonymize your personal data before sharing it with a third party so that we can re-associate you with the information once it has been processed and returned to us. Whilst the third party will not be able to identify you from the pseudonymized information, we will still be able to. We treat pseudonymized data as though it were personal data and ensure the same level of protection for it when sharing with third parties.

In addition, Constl may disclose your personal information to:

- You or Your authorized representatives or your legal advisers (when requested by you to do so)
- Credit-reporting and fraud-checking agencies
- Credit providers (for credit related purposes such as creditworthiness, credit rating, credit provision and financing)
- Constl Group Companies and /or Sister concerns of Constl
- Constl's professional advisers, including its accountants, auditors and lawyers.
- Government and regulatory authorities, agencies, and other organizations, as required or authorized by law; and

Storage and Retention:

Your information or data will primarily be stored in electronic form. However, certain data can also be stored in physical form.

Your information will remain with us during your active association on account of subscription to our services and/or on account of business association with us in whatsoever form, direct and indirect. Post your disassociation, the information will be retained by us for a minimum period of 180 days or such longer period as may be mandated in accordance with law and/or under specific instructions from any Court, Government and Statutory Authorities.

Confidentiality of Personal Information:



Privacy Policy

We have procedures that limit employee access to your personal information to those employees only who need to have access to the personal information. We also educate our employees about the importance of confidentiality and customer privacy through standard operating procedures, training programs, and internal policies.

All our employees are obligated to protect confidentiality and ensure security as per our internal policies. Our third-party contractors are bound by contractual obligations to adopt and maintain reasonable levels of security practices and procedures to ensure the security of information received from us in the course of operations.

To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, we have put in place physical, electronic, and managerial procedures to safeguard and secure the personal data we collect through our Sites and in the provision of our Services. We have put in place reasonable controls (including physical, technological, and administrative measures) designed to help safeguard the personal data that we collect via the sites. No security measures are perfect, however, and so we cannot assure you that personal data that we collect will never be accessed or used in an unauthorized way, which may happen due to circumstances beyond our reasonable control. We have put in place procedures to deal with a suspected personal data breach, and we shall notify you and any applicable regulator of a breach where we are legally required to do so. If you have a username and password to access our services, you should take steps to protect against unauthorized access to your password, phone and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen or compromised passwords, or for any activity on your account via unauthorized password activity or other security breach caused by you.

Protecting your information exchanged online:

When you apply online for our service, or provide information to us at our website, you provide personal and financial information that is necessary for us to process your application or payments. Information provided to us at our website is sent in a "secure session" established with Secure Sockets Layer (SSL) technology. SSL protects information that is sent over the Internet between your computer and us by encrypting it and thus prevents misuse.

Limitation of Liability:

You will appreciate and agree that no data transmission over the Internet is completely secure and for reasons outside of our control, security risks may still arise. Constl cannot protect any information that you make available to the general public in any publicly accessible area of our website or any other media. Constl shall not be responsible for any breach of security, or the disclosure of Personal Information unless Constl has been proven to be grossly and wilfully negligent.

Access, Correction and Deletion:



Privacy Policy

Constl takes all reasonable precautions to ensure that the personal information it collects, uses and discloses is accurate, complete and up to date. However, the accuracy of the information depends to a large extent on the information that you provide. That's why Constl recommends that you:

- Let Constl know if there are any errors in your personal information; and
- Keep Constl up to date with changes to your personal information such as your name or address. Constl reserves the right to charge a fee for searching for and providing access to your information.

You may write to Constl in connection with deleting or amending your information maintained and retained with Constl, by sending an email to the appointed Grievance Officer at designated ID viz. **connect@constl.com**. However, you will also agree that certain data or information cannot be corrected or deleted or is prohibited to be deleted as required under any applicable law, law enforcement requests or under any judicial proceedings and thus, shall continue to be maintained by Constl, as per mandates.

Changes to this Policy:

Any future changes or additions to the processing of your personal data as described in this Privacy Policy will be notified to you in advance through an individual notice through our usual communication channels (e.g., by email or via our internet websites).

Disclaimer:

Terms of this privacy policy are subject to the Constl's 'Terms of Use' of the Site which are hereby incorporated impliedly and are deemed to have been read, understood and unconditionally accepted by you.

We believe that there are various factors due to which the compliance of the above Policy may go out of our control, including factors of force majeure and in such situations, we shall not be held responsible.

Constl shall assume no responsibility for the content or privacy practices of any other web site, company or organization, including web sites that may be accessed through any link from this Website.

While every attempt is made to ensure that the information contained in this site has been obtained from reliable sources, Constl shall not be responsible for any errors or omissions, or for the results obtained from the use of this information. All information in this website is provided "as is", with no guarantee of completeness, accuracy, timeliness or of the results obtained from the use of this information, and without warranty of any kind, express or implied, including, but not limited to warranties of performance, merchantability and fitness for a particular purpose. In no event will Constl, its business associates, agents or employees thereof be liable to you or anyone else for any decision made or action taken in reliance on the information in this Website or for any consequential, special or similar damages, even if advised of the possibility of such damages.