

PRIVACY POLICY

This Privacy Policy (“Policy”) describes how Verde Tecido Global LLP (“Company”, “LLP”, “we”, “us”, or “our”) collects, uses, processes, stores, discloses, and protects personal data obtained through our website www.tecidoglobal.com (“Website”) and through our corporate gifting and branded merchandise services.

This Policy is published in compliance with:

- The Information Technology Act, 2000 (“IT Act”) and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“SPDI Rules”);
- The Digital Personal Data Protection Act, 2023 (“DPDP Act”) and the rules and regulations framed thereunder; and
- Any other applicable laws, regulations, and guidelines in India.

By accessing or using our Website or services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Policy. If you do not agree with the terms herein, please discontinue use of our Website and services.

1. Definitions

For the purposes of this Policy, the following terms shall have the meanings ascribed to them below:

Data Fiduciary: The LLP, which determines the purpose and means of processing personal data.

Data Principal: The individual to whom the personal data relates, i.e., the user of our Website or recipient of our services.

Personal Data: Any data about an individual who is identifiable by or in relation to such data.

Sensitive Personal Data or Information (SPDI): As defined under Rule 3 of the SPDI Rules, including passwords, financial information, health data, biometric data, and other categories specified thereunder.

Processing: Any operation or set of operations performed on personal data, including collection, recording, storage, use, disclosure, transfer, or deletion.

Consent Manager: A person registered with the Data Protection Board, who enables a Data Principal to manage consent (as applicable under the DPDP Act).

2. Information We Collect

We collect the following categories of information:

2.1 Information Provided Voluntarily

- Full name, designation, and organisation name
- Business email address and contact number
- Billing and shipping address
- Details of gifting requirements, product preferences, and order specifications
- Communications, feedback, and enquiry details submitted through contact forms or email

2.2 Information Collected Automatically

When you visit our Website, we may automatically collect:

- Internet Protocol (IP) address and device identifiers
- Browser type, version, and operating system
- Pages visited, time spent, and clickstream data
- Referring URLs and search terms
- Cookie identifiers and similar tracking technologies

2.3 Sensitive Personal Data or Information

We do not ordinarily collect Sensitive Personal Data or Information (SPDI) as defined under the SPDI Rules. In the event any SPDI is incidentally provided to us, it shall be handled with heightened security measures and in strict compliance with applicable law. We do not collect financial account information, passwords, biometric data, or health-related information through our Website.

3. Purpose of Collection and Use of Personal Data

We collect and process personal data for the following lawful purposes:

- **Service Delivery:** To process enquiries, prepare proposals, fulfil orders, and deliver corporate gifting and branded merchandise services.
- **Client Communication:** To respond to queries, send order confirmations, updates, and service-related notifications.
- **Business Operations:** To manage accounts, process invoices, and maintain records in compliance with applicable laws.
- **Marketing and Promotions:** To share information about our offerings, promotions, and updates, subject to your consent where required.
- **Website Analytics:** To monitor, analyse, and improve Website performance, user experience, and content.
- **Legal Compliance:** To comply with applicable laws, regulations, judicial or regulatory orders, and to protect our legal rights and interests.
- **Security:** To detect, investigate, and prevent fraudulent transactions, abuse, and other illegal activities.

Personal data shall not be used for any purpose other than those specified above without obtaining your prior consent, except as required by law.

4. Legal Basis for Processing

Under the DPDP Act, we process personal data on the following bases:

- **Consent:** Where you have provided free, informed, specific, and unambiguous consent for processing your personal data for a specified purpose.
- **Legitimate Uses:** For compliance with legal obligations, protection of life or property, or other legitimate uses prescribed under the DPDP Act or other applicable laws.
- **Contractual Necessity:** Where processing is necessary for the performance of a contract to which you are a party, or for taking steps at your request prior to entering into a contract.

5. Disclosure and Sharing of Personal Data

We do not sell, trade, or rent your personal data to third parties. We may share your personal data in the following limited circumstances:

- **Service Providers and Vendors:** With trusted third-party service providers who assist us in Website operations, logistics, payment processing, and marketing, under strict confidentiality obligations.
- **Brand and Merchandise Partners:** With our brand partners to the extent necessary for fulfilling your gifting orders, subject to appropriate data protection agreements.
- **Legal and Regulatory Authorities:** Where required by law, court order, government authority, or regulatory body, or where necessary to protect our rights, property, or safety, or that of our users or the public.
- **Business Transfers:** In connection with a merger, acquisition, restructuring, or sale of assets, personal data may be transferred to the successor entity, subject to equivalent data protection obligations.

All third parties with whom we share personal data are required to maintain adequate data protection standards consistent with applicable law.

6. Cookies and Tracking Technologies

Our Website uses cookies and similar tracking technologies to enhance user experience and analyse Website traffic. Cookies are small text files stored on your device.

We use the following types of cookies:

- **Strictly Necessary Cookies:** Essential for the operation of the Website and cannot be disabled.
- **Analytical / Performance Cookies:** Help us understand how visitors interact with the Website (e.g., Google Analytics).
- **Functional Cookies:** Enable enhanced functionality and personalisation.
- **Marketing Cookies:** Used to deliver relevant advertisements and track campaign effectiveness. These are activated only with your consent.

You may manage your cookie preferences through your browser settings. Please note that disabling certain cookies may affect the functionality of the Website.

7. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including for the satisfaction of any legal, regulatory, accounting, or reporting obligations. The retention period shall be determined based on:

- The nature and sensitivity of the personal data;
- The purposes for which the data is processed;
- Applicable statutory or regulatory retention requirements; and
- The period necessary to resolve disputes or enforce agreements.

Upon expiry of the retention period, personal data shall be securely deleted, anonymised, or de-identified, in accordance with applicable law.

8. Rights of Data Principals

Under the DPDP Act and other applicable laws, you have the following rights with respect to your personal data:

- **Right to Access:** You have the right to obtain a summary of the personal data we hold about you and the processing activities undertaken therewith.

- **Right to Correction and Erasure:** You have the right to correct inaccurate or incomplete personal data, and to request erasure of personal data that is no longer necessary for the purposes for which it was collected.
- **Right to Grievance Redressal:** You have the right to have your grievances addressed in a timely and effective manner.
- **Right to Nominate:** You have the right to nominate another individual to exercise your rights in the event of your death or incapacity.
- **Right to Withdraw Consent:** Where processing is based on consent, you have the right to withdraw consent at any time. Withdrawal of consent shall not affect the lawfulness of processing undertaken prior to such withdrawal.
- **Right to Complain:** You have the right to lodge a complaint with the Data Protection Board of India, once constituted under the DPDP Act.

To exercise any of the above rights, please contact our Grievance Officer at the details provided in Section 12 below.

9. Security of Personal Data

We implement reasonable security practices and procedures as mandated under Rule 8 of the SPDI Rules and the DPDP Act to protect personal data against unauthorised access, loss, misuse, alteration, or destruction. These include:

- SSL/TLS encryption for data transmitted through the Website;
- Access controls and authentication mechanisms;
- Regular security assessments and vulnerability testing;
- Data handling and privacy training for personnel with access to personal data;
- Documented information security policies consistent with ISO 27001 or equivalent standards.

Notwithstanding the above, no method of transmission over the internet or electronic storage is completely secure. We cannot guarantee absolute security of your personal data and you share it at your own risk.

10. Cross-Border Transfer of Personal Data

Personal data collected through our Website is primarily processed and stored within India. In the event of any cross-border transfer of personal data, such transfer shall be undertaken only in accordance with the provisions of the DPDP Act and applicable rules notified by the Central Government, including transfers to countries or territories specified in the whitelist notified under Section 16 of the DPDP Act.

11. Third-Party Websites and Links

Our Website may contain hyperlinks to third-party websites or platforms. This Policy does not apply to such third-party websites, and we are not responsible for their privacy practices. We encourage you to review the privacy policies of any third-party websites you visit.

12. Grievance Officer

In accordance with Rule 5(9) of the SPDI Rules and the DPDP Act, we have designated a Grievance Officer to address concerns relating to the processing of personal data. Any grievances, queries, or requests regarding this Policy or your personal data may be directed to:

Grievance Officer

Name: Priti Bhandari

Email: info@tecidoglobal.com

Address: 20th Floor, Oberoi Commerz II, Oberoi Garden City, Goregaon (E), Mumbai, India

Working Hours: Monday to Friday, 10:00 AM to 6:00 PM IST

We shall endeavour to address grievances within 30 (thirty) days of receipt, in accordance with applicable law.

13. Children's Privacy

Our Website and services are not directed at children below the age of 18 years. We do not knowingly collect personal data from minors. If we become aware that personal data of a minor has been collected without verifiable parental or guardian consent, we shall take prompt steps to delete such data. Parents or guardians who believe their child has provided personal data to us are requested to contact our Grievance Officer immediately.

14. Amendments to this Policy

We reserve the right to update or amend this Policy from time to time to reflect changes in our practices, legal requirements, or operational needs. The revised Policy shall be published on our Website with an updated effective date. Where amendments are material, we shall notify you by appropriate means, including email notification or a prominent notice on the Website. Continued use of the Website or services after the revised Policy becomes effective shall constitute your acceptance of the amended terms.

15. Governing Law and Jurisdiction

This Policy shall be governed by and construed in accordance with the laws of India. Any disputes arising under or in connection with this Policy shall be subject to the exclusive jurisdiction of the competent courts in Mumbai, Maharashtra, India.

Acknowledgement

By using the Website or submitting your personal data to us, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use, and processing of your personal data in the manner described herein. If you have any questions or concerns regarding this Policy, please contact our Grievance Officer at the details provided in Section 12 above.

www.tecidoglobal.com