

# Klathrate Privacy Policy

When you use Klathrate services, you trust us with your information. Your privacy is important to us. This notice explains our online information practices and the choices you can make about the way your information is used at our Website ([www.klathrate.com](http://www.klathrate.com)).

This Privacy Statement describes how Klathrate collects, uses, and discloses certain personal information obtained through our global public websites at [www.klathrate.com](http://www.klathrate.com) (“Websites”). This Privacy Statement does not address information collection through other sources such as in-person seminars or personal contacts. This is important; we hope you will take time to read it carefully. And remember, you can find controls to manage your information and protect your privacy and security at your Klathrate account.

## 1. Who we are

1.1. This website is operated by Klathrate. (“Klathrate”, “we” or “us”). We make certain software applications and platforms available to customers on our Site for the purposes of providing a business network and supporting the exchange of business documents between each customer (the “**Services**”). For the purpose of this Privacy Policy, the user of Services may be merchants/sellers/billers, customers/buyers/consumers, or any other persons using Services or accessing Sites (“User”, “you” or “your”).

1.2. Our privacy policy and terms of use (respectively referred to from now on as the “Privacy Policy” and the “Terms of Use”) apply when you use our website ([klathrate.com](http://klathrate.com)) (“our Site”). The term Sites will also include all pages that are sub-domains or are associated or within each Site and all devices, applications, features, technologies, functionalities and other services that Klathrate operates or offers through such Sites. Please read the Privacy Policy and Terms of Use carefully before you start to use our Site. By using our Site, you indicate that you accept the Privacy Policy and Terms of Use and that you agree to abide by them. If you do not agree to them, please refrain from using our Site.

## 2. Defined terms used in privacy policy

2.1. “**Software**” means any software accessible on our Site for the use of Users (whether free or if payment is required).

2.2. “**User**” means any person using our Site or the Software (whether that person has paid for such use or not) and “Users”, “you” and “your” shall be construed accordingly.

2.3. “**the Act**” means the Data Protection Act 1998.

## 3. Introduction to privacy policy

3.1. Klathrate respects your privacy and is committed to protecting your privacy and confidential information. This Privacy Policy (together with our Terms Of Use and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we, as data controller of your personal data that you provide to us, will treat it. There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by creating a **Klathrate Account**, we can make those services even better – to **show you more relevant search results and ads** (For example, we can make search more relevant and interesting for you by including photos, posts, and more from you and your friends.), **to help you connect with people** (For example, you could get suggestions of

people you might know or want to connect with on Klathrate network, based on the connections you have with people on other networks like Google products, like Gmail or any other Email or social networks like Facebook, LinkedIn etc. for that matter and people who have a connection with you may see your profile as a suggestion.) or **to make sharing with others quicker and easier**. (For example, if someone is already a contact, Klathrate will autocomplete their name if you want to add them to a message in documentation.) As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

The Services are intended for use by organisations and in accordance with their instructions. If you are using the Services in a workplace or on a device or account issued to you by your employer or another organisation (your "Organisation"), that Organisation likely has its own policies regarding storage, access, modification, deletion, and retention of information you submit or provide through the Services. If you use the Klathrate Services as part of an entity or organisation that has an agreement with Klathrate (like your employer or a university), the terms of that organisation's contract for the Klathrate Services may restrict our collection or use of your information more than what is described in this Policy.

This means that your Organisation has the right to (i) control and administer your Workplace account ("Your Account") and (ii) access and process any data you submit or provide through the Services, including, for example, your files and communications. Please contact your Organisation with any privacy inquiries regarding policies, including any enterprise agreements with Facebook, it has in place regarding your use of the Services. We take it that you are authorised person of your organisation to share data of your organisation and your organisation has given consent to you to share information and also you are in consent to with us to share your personal data.

This Privacy Statement ("Statement") applies to persons and companies anywhere in the world who use our apps or Services to connect with business via EDI network and showcase your products services ("Users").

We may also ask you for information when we process your application to use our services, when we deliver services to you, and when you report a problem with our site. If you contact us, we may keep a record of that correspondence.

Unless you have purchased a Klathrate Enterprise account or higher Klathrate Service offering and you have entered into a Business Associate Addendum to the Klathrate Service Agreement, you agree not to upload and/or collaborate Protected Health Information ("PHI") as defined under the Health Insurance Portability and Accountability of 1996 Act as amended ("HIPAA"); Klathrate disclaims all liability for such PHI.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them. We may further collect and process any Personal Data that you volunteer to us, e.g. when you register for events or other offerings of Klathrate, subscribe to newsletters, participate in online surveys, discussion groups, forums or Klathrate's chat service, or when you make purchases, apply for a job, request customer support, communicate with us via third-party social media sites communicate with us or otherwise submit your contact details to Klathrate.

By using this website, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not use this website.

As may be required by applicable law, we may also seek your explicit consent to process certain Personal Data collected on this website or volunteered by you. Kindly note that any consent will be entirely voluntarily. In case you do not grant the requested consent to the processing of your Personal Data. inform Klathrate that you do not want Klathrate to further process your Personal Data, however, the (further) use of certain offerings or services of Klathrate may be either not possible or limited in scope.

Our Privacy Policy explains:

#### **4. What Information we may collect from you, why we need it and how we use that information and The choices we offer, including how to access and update information.**

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

4.1.1. **When you visit our Site:** Our cookies policy explains what data we collect from you and what we do with it when you browse through our Site (e.g. your IP address). The IP address of your computer and other information about the device you use to access our service, from which you may be identifiable. Depending on the Automated Tools used, the gathered data comprise, in addition to your IP address, the cloud identity we assign to you.

4.1.2. **When you register on our Site:** Contact information, such as full name and email address; Demographic information; Username and password; Work title, department information, and other information related to your work or Organisation; All content that you create, share or post in audio, video, text, images, and other media or software files that you provide on or through the Services, or that are provided on your behalf, including information in or about the content you provide, such as the location of a photo or the date a file was created; Information other people provide about you when using the Services, including when they send a message to you or upload information about you; All communications with other users of the Services; User communications, feedback, suggestions, and ideas sent to us; Billing information; and Information you provide us when you or your Organisation contact or engage us for support regarding the Services. The objects you have clicked on a certain Klathrate website, the time you have spent on a certain website, the referring website from which you have accessed a Klathrate website and the foreign destination website which you access from an Klathrate website. Your interest in Klathrate's products, the time you have spent on a certain product you searched. In case you provide Klathrate with your IDs of social media, Klathrate may retrieve publicly available information about you. The information of third parties such as name, email address, etc. as may be provided in order to enable the functionality and features of the Box Service. For example, if you invite a user to Klathrate, we will collect their email address in order to provide them with an invite to the Klathrate Service in order to collaborate on the Content you designated.

4.1.2.1 **What data we collect:** When you register on our Site we will collect your username, country of business and email address. In general, you can visit our Websites without telling us who you are or revealing any information about yourself. There are times, however, when we ask for personally identifiable information from you, such as your name, company, e-mail address, phone number, and address as well as other personal contact details ("Personal Information").

**Navigational and Log Information:** We collect information about your navigation using our Services, for example the URLs of websites from which you reach our Site, and from which you request downloads, pages visited/ downloaded on our Site, websites or pages of merchants you visit using our Services. We may also collect information such as your domain name, web request, IP address, mobile application version, type of operating system that your computer uses, browser type, browser language, location, date and time of request, the products you buy, the referring site, and the time that you spend on the site.

**Correspondence Information:** We collect the content, information about your correspondence, the destination/origin of communications between you and any other person using our Services, which include email communications, blog, chat room and discussion board communications, instant

message communications, experts forum communications, facsimile mail communications, membership of mailing lists etc. The information of third parties such as name, email address, etc. as may be provided in order to enable the functionality and features of the Klathrate Service. For example, if you invite a user to Klathrate, we will collect their email address in order to provide them with an invite to the Klathrate Service in order to collaborate on the Content you designated.

We access data or information stored by third party in case required for providing you uninterrupted and satisfactory Services or in case consented by you.

When you use Klathrate services, we may collect and process information about your actual location. We use various technologies to determine location, including IP address, GPS, and other sensors that may, for example, provide Klathrate with information on nearby devices, Wi-Fi access points and cell towers.

**4.1.2.2 Why we need this data:** We will need your username in order to authenticate your user account so that you can benefit from our Services. We will need your email address to send you an activation link to your profile so that you can receive business documents and network requests. We will also need your email address in case you forget your password or wish to receive emails from us with news about our services or changes to any of our policies or terms and conditions. We need your data to correspond with you, to provide you with a subscription to a newsletter or publication, notify you about events, or otherwise to respond to your requests or provide you with information that we consider may be of interest to you; provide and improve our services to you and to our clients including handling Personal Information of others on behalf of our clients; market our services; assist recruitment; improve our websites; compile anonymous statistics, for example, Website usage statistics; fulfil our legal obligations; and deal with situations when you report a problem with our Website(s).

Your IP address is logged by us so that we can prevent any spam, fraud or abuse of our Site. We will store this data only for as long as necessary for the purposes of the Services, unless we are required, for legal reasons or under exceptional circumstances, to retain this data for an extended period.

Where applicable, we will differentiate between personal data fields that are optional and those that are mandatory to obtain the requested information. The information you give to us may include Personal Information, such as your name, address, email address and other personal contact details. The other information that can be gathered when you visit our Website(s) includes information in relation to your visit.

Also, we cannot guarantee the privacy of personal information you transmit over the web or that may be collectable in transit by others, including contractors who provide services to us.

To improve our Services, we need to constantly update and alter our business and marketing strategies for which we require the navigational and log information to determine and analyse the merchants, markets, technology, operating systems, browsers, devices, locations from which our Services are used most or used least. For example, such information and its analysis will help us focus more on your needs by providing you a wider range of Services, or developing updates for particular operating systems and mobile application versions, etc. Further, the information collected helps us offer you other products, programs, or services that we believe may be of interest to you. In addition, such information collected will help us alert you in case of software compatibility issues.

We want to serve you better and therefore we require your correspondence information in order to enable us to learn about the information and content of communications by you such that we can deduce your feedback from such communications, analyse, endeavour to improve, ask you for further feedbacks, reply

4.1.2.3. **How we use this data:** We will not share you login data (your username, email address, password and IP address) with anyone except in the circumstances referred to in Clause 8 (Disclosure of Your Information).

4.1.2.4 From time to time we may email you news, updates and sales offers which you can easily opt out of receiving by clicking “unsubscribe” in the relevant email.

4.1.3. When you contact us or submit comments on our Site:

4.1.3.1. If you submit comments on our Site or contact us for any reason we may store these communications for as long as necessary for the purposes of improving the Services we offer, unless we are required, for legal reasons or under exceptional circumstances, to retain this information for an extended period.

#### **4.1.4. Payments:**

4.1.4.1. Our Site operates a payment solution. However there are some services (e.g. apps) you can buy. If you opt to pay for any of our Services, we will direct you to make payment through a third party site. Details of transactions you carry out through our site or service and that we process for you. Such information may include payment amounts, and personal details of persons to whom you are sending payments. Those persons may also give us their personal information. We retain such information for each of your transactions using our service, and may add it to your account profile for use in relation to future transactions made through our service. The IP address of your computer and other information about the device you use to access our service, from which you may be identifiable. We retain this information to detect unauthorised transactions. The above information about you may include your name, address, phone number and email address, client’s business name, registration number, business address, copies of ID of directors, director’s name, director’s date of birth, employment details and information relating to your financial circumstances. In order for us to provide our payment processing services to you, you must provide bank account information, and “know your client” information, password information, and responses to security questions. In addition to the “know your client” information you provide when you apply for an account with Klathrate, we may ask you for further identification information in the course of providing services to you, in particular, if you send or receive high value payments, or to comply with our anti money laundering regulations. In order to protect our customers against potential fraud, we may verify the information that you provide to us with other payment processors, banks, credit reference agencies, fraud checking agencies, providers of operational services, and regulators, such as the Financial Services Authority

4.1.4.2. **What data we collect:** The third party site will provide us with, and we will then store, the date on which you made the payment and the date that your account will expire with the third party payment provider, along with a generic number. We may (and you give us your consent), store your financial information such as your bank account or details mentioned on your credit cards or debit cards, or other payment instrument details etc. that are required for a successful transaction. Further, for certain Services, including our bill payment service, we require your bill payment account information such as your account number, payment history, your account history with us etc. We also store transaction details such as amount spent, merchant name, transaction ID, date and time of transaction, of your e-commerce transactions. Further, we may also store information relating to your income and lifestyle levels. but this data may also be stored by the third party payment provider handling the transaction.

4.1.4.3. **Why we need this data:** We store this information as it enables us to know when your account will expire. We need your order reference so that we can link your order to your account.

We will store this information for up to two years, unless we are required, for legal reasons and under exceptional circumstances, to retain this information for an extended period.

4.1.4.4. We are not responsible for any third party payment provider handling your transaction and you should refer to the third party payment provider's privacy policy to see how they use your data.

4.1.4.5. Combinations of the information collected as mentioned in this Privacy Policy such as physical address, device information, email address when coupled with information which is not Personal Information such as speed of typing, the maximum screen area usage, other patterns and data help us detect and protect Users and ourselves against errors, fraud, or other criminal activity.

## **5. Cookies.**

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our site. By continuing to use our Web site, you are agreeing to our placing cookies on your computer in order to analyse the way you use our Web site. Please read this cookie policy carefully for more details about the information we collect when you use this site.

If you do not wish to accept cookies in connection with your use of this Web site, you must stop using our site.

### **Information about cookies**

Useful information about cookies can be found at:

<http://www.allaboutcookies.org/>

### **Internet Advertising Bureau**

A guide to behavioural advertising and online privacy has been produced by the internet advertising industry which can be found at:

<http://www.youronlinechoices.eu/>

### **International Chamber of Commerce United Kingdom**

Information on the ICC (UK) UK cookie guide can be found on the ICC Web site section:

<http://www.international-chamber.co.uk/our-expertise/digitaleconomy>

### **Key concepts**

**First and third-party cookies:** whether a cookie is 'first' or 'third' party refers to the domain placing the cookie. First-party cookies are those set by a Web site that is being visited by the user at the time (e.g. cookies placed by [www.klathrate.com](http://www.klathrate.com)).

**Third-party cookies** are cookies that are set by a domain other than that of the Web site being visited by the user. If a user visits a Web site and another entity sets a cookie through that Web site, this would be a third-party cookie.

**Persistent cookies:** these cookies remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the Web site that created that particular cookie.

**Session cookies:** these cookies allow Web site operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

What cookies do we use and why?

To find out about specific cookies we use on this site, please see below.

The cookies used on our site are categorised as follows:

Performance  
Targeting  
Performance

'Performance' cookies collect information about how you use our Web site - eg which pages you visit and if you experience any errors. These cookies do not collect any information that could identify you and are only used to help us improve how our Web site works, understand what interests our users and measure how effective our content is.

We use performance cookies to:

Web analytics: Provide anonymous statistics on how our Web site is used  
Error management: Help us improve the Web site by measuring any errors that occur.  
Some of our performance cookies are managed for us by third parties. However, we don't allow the third party to use the cookies for any purpose other than those listed above.

By using our site, you accept the use of 'Performance' cookies. Accepting these cookies is a condition of using the Web site, so if you prevent them we cannot guarantee how our site will perform for you.

Targeting

We give users the option to share our stories on social networks such as Facebook and Twitter. To deliver this service we link to a third party website called AddThis. We have prevented AddThis from automatically setting cookies as you navigate our Web site. If you use our share buttons you will be directed to a website controlled by AddThis. We have no control over the cookies that AddThis sets when you use its services. You can opt out of addthis.com cookies.

5.1. We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The cookies we use are essential for our Site to enable us to:

5.1.1. Estimate our audience size and usage pattern;

5.1.2. Store information about your preferences, and so allow us to customise our Site and to provide you with offers that are targeted at your individual interests;

5.1.3. Recognise you when you return to our Site;

5.1.4. Allow you to use our Site in a way that makes your browsing experience more convenient, for example, by allowing you to store details of invoices you have been using as part of our Services. If you register with us or complete our online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim; and

5.1.5. Allow selected third parties (such as Google) to target specific marketing material to you based on your browsing history preferences.

5.1.6. The data collected by cookies helps us track, analyse and understand User trends so as to enable us to understand lacunas (such as slow response time on our website page) and improve your interactive experience of using our Services, our web design, features and functionalities.

5.2. You can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our site.

5.3. Except for essential cookies, all cookies will expire after 2 years. For guidance on when Google's cookies will expire, please see Google's privacy policy.

#### 5.4. Can I withdraw my consent?

If you wish to withdraw your consent at any time, you will need to delete your cookies using your internet browser settings.

For further information about deleting or blocking cookies, please visit: <http://www.aboutcookies.org/Default.aspx?page=2>.

What specific cookies do we use on [www.klathrate.com](http://www.klathrate.com)?

#### First party cookies

| Cookie name        | Purpose                                                    | Duration   | Strictly necessary (Y/N) | Domain source                                    | Category    |
|--------------------|------------------------------------------------------------|------------|--------------------------|--------------------------------------------------|-------------|
| Preferred-view     | Used to track user's view selection                        | 1 year     | N                        | <a href="http://klathrate.com">klathrate.com</a> | performance |
| Recommended items  | Used to track user's searches to present recommended items | session    | N                        | klathrate.com                                    | performance |
| Hide-notice-cookie | Used to track user's acceptance of cookie policy           | persistent | N                        | klathrate.com                                    | performance |

#### Third party cookies



|             |                                                                                                                                        |          |   |                                                                                     |             |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------|----------|---|-------------------------------------------------------------------------------------|-------------|
| _utma       | Determines first visit to the site from a particular browser                                                                           | 2 years  | N | <a href="http://klathrate.com">klathrate.com</a><br>Google Analytics*<br>JavaScript | performance |
| _utmb       | Used to establish and continue a user session with the site                                                                            | 30 mins  | N | <a href="http://klathrate.com">klathrate.com</a><br>Google Analytics*<br>JavaScript | performance |
| _utmc       | Holds time stamp of the exact moment when a visitor leaves the site                                                                    | session  | N | klathrate.com<br>Google Analytics*<br>JavaScript                                    | performance |
| _utmz       | Records type of referral used by visitor to reach the site (such as direct, referring link, Web site search, ad campaign, e-mail link) | 6 months | N | klathrate.com<br>Google Analytics*<br>JavaScript                                    | performance |
| uid         | Uniquely assigned machine-generated user ID                                                                                            | 2 years  | N | AddThis                                                                             | performance |
| di/dt       | Maintenance cookies that help manage expiration for other cookies                                                                      | session  | N | AddThis                                                                             | performance |
| bt          | User interest modeling                                                                                                                 | 2 years  | N | AddThis                                                                             | performance |
| uvc         | Measures how often we see an AddThis user. It expires after 2 years.                                                                   | 2 years  | N | AddThis                                                                             | performance |
| ssc/psc/uvc | Used in recording user sharing and social activity. These expire after 2 years.                                                        | 2 years  | N | AddThis                                                                             | performance |

|          |                                                                                                        |         |   |         |             |
|----------|--------------------------------------------------------------------------------------------------------|---------|---|---------|-------------|
| loc      | Geo-location, used to help publishers know approximately where people sharing information are located. | 2 years | N | AddThis | performance |
| ssh/sshs | Used for optimizing sharing settings for the user                                                      | 2 years | N | AddThis | performance |

For more information about Google analytic cookies, please see Google's help pages and privacy policy:

[Google's Privacy Policy](#)  
[Google Analytics Help pages](#)

Google have developed the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js).

If you want to opt out of Google Analytics, you can download and install the add-on for your web browser.

#### Additional third party cookies

We occasionally link to interactive digital publications called Zmags. If you click on Zmags links, you will be directed to a website controlled by Zmags. We have no control over the cookies that Zmags sets when you use its service..

However, you can read about the cookies that Zmags uses and opt out of Zmags cookies.

#### Third party application forms

When accessing our Web Site from and completing a job application form pertaining to the United States or Australia, the online job application forms linked to from this Web site are operated by third party service providers who may use cookies to enable you to complete the registration process, to submit your application successfully and to log into and access your account.

## 6 Where we store your personal data

6.1. All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

6.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your

information, we will use strict procedures and security features to try to prevent unauthorised access.

## **7 Updating your personal data**

7.1. We will need you to help us ensure the Personal Data you provided to us is accurate and up to date. If you wish to correct and update any of your Personal Data, you may do so by updating the Personal Data through the preferences available in your account.

7.2. If you want to delete your account, you may do so by deleting your profile from the preferences page in your account. Upon deletion of your account, we will store your Personal Data for the duration set out in Clause 4.1.2.2.

## **8. Disclosure of your personal information**

8.1. In the event that Klathrate becomes part of a group of companies, we may disclose your data to any member of such group, which means any subsidiaries of Klathrate or its ultimate holding company and its subsidiaries, as defined in India Companies Act 2006.

8.2. We may disclose your personal information to third parties:

8.2.1. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

8.2.2 If Klathrate is, or substantially all of its assets are, acquired by a third party, in which case personal data held by it about its Users will be one of the transferred assets; or

8.2.3. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or our safety, our Users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

8.2.4. We collect and use some of your information in an aggregated form to compile statistical and demographical profiles for our business and marketing activities and to customise our Services to you. We may disclose such information about you, provided that the information is in an aggregated form that is not capable of being used or interpreted in such a manner as to identify you. It is clarified that the consolidated Personal Information of all Users which has been collected by us, is the property of Klathrate and we may use it, in whole or in part, in our sole discretion and without any compensation to you, for any legitimate purpose and you hereby confirm that you have no objection to the aforesaid use of your Personal Information.

8.2.5. We will only disclose your Personal Information in accordance with this Privacy Policy. If we want to use it for any other purpose, we have no obligation for taking your written consent.

8.2.6. If you decline to submit Personal Information to us, then we will unfortunately not be in a position to provide the Services to you.

## **9 Access to information**

9.1. The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of minimum \$10 or more according to meet our costs in providing you with details of the information we hold about you. Please send any access requests to [info@klathrate.com](mailto:info@klathrate.com)

9.2. If, by usage of some functionalities of our Service, you receive Personal Information about other user(s), you agree to keep the same confidential and only use it in connection with the Services, without disclosing the same to another user or third party.

9.3. In order to ensure that all our users comply with the user rules, we may monitor your Personal Information to the extent that this may be required to determine compliance and/or to identify instances of non-compliance.

9.4. The User can at any time while availing the services or otherwise, withdraw his/her consent given previously to Klathrate for collecting, receiving, possessing, storing, dealing or handling Personal Information of the User, by sending us your request by email on the 'contact us' page on [www.klathrate.com](http://www.klathrate.com). In such case, Klathrate will unfortunately not be in a position to provide the Services to you. However, Klathrate will be able to retain such Personal Information for the time period in accordance with the applicable laws.

## **10. Security of data and other personal information**

10.1. We work to protect the security of your Personal information during transmission by using appropriate software, which encrypts information you input. This encrypted information is stored on secure systems/computers. Further, we ensure that the number of employees involved in the management of the data centre who have physical access to these computers is limited. Also, we use advanced security technology to prevent our computers from being accessed by unauthorised persons.

10.2. We have also implemented information security practices and standards and have in place comprehensively documented information security programmes and policies containing managerial, technical, operational and physical security measures that are in compliance with the Indian laws including, so as to protect the Personal Information provided to us from unauthorised access, use, modification, damage, disclosure or impairment. We may from time to time use reasonable additional or alternative procedures to ensure the security and confidentiality of your Personal Information through our Sites.

10.3. No data transmission over the internet is fully secure, so we cannot ensure or warrant the security of any information you submit to us. Further, we do not guarantee in any way, the security of any Personal Information that you transmit or share on the Site; and you do so at your own risk.

10.4. If any security breach comes to our knowledge, then we may take all steps required to protect misuse of such Personal Information and may attempt to notify you electronically so that you can take appropriate protective steps.

10.5. Any of your information which you provide when you use our Services to an open, public environment or forum including (without limitation) any blog, chat room, community, classifieds or discussion board, (a) will not be considered confidential, (b) will not be considered as Personal Information, and (c) is not subject to protection under this Privacy Policy. Since such public environments are accessible by third parties, it is possible that third parties may collect or use such information for their own purposes. You should accordingly be careful when deciding to share any of your Personal Information in such public environments. Please note that we are not liable to you or any third party for any damages that you or any third party may suffer on account of your disclosure of Personal Information in any public environment.

## **11. Changes to the Privacy Policy**

**11.1.** Klathrate reserves the right to change, modify, add, or remove portions of this Privacy Policy at any time for any reason. In case, any changes are made in the Privacy Policy, Klathrate shall update the same on the website. Users should periodically review this page for the latest information on our privacy practices. Once posted, those changes are effective immediately, unless stated otherwise. The revised policy will also apply retroactively to all data we have collected through the website. Continued access or use of the Services constitutes your acceptance of the changes and the amended Privacy Policy. However, if you do not agree with the changes, please do not continue to use the Services or submit Personal Information to us.

## **12. Links.**

12.1. The Klathrate website may contain links to or from other websites. Please be aware that we are not responsible for the privacy practices of other websites. We encourage you to read the privacy policies of other websites you link to from the Klathrate website or otherwise visit.

## **13. Contact us.**

**13.1.** If you have any questions, queries, concerns or feedbacks about this Privacy Policy or our Privacy related practices, please first contact us on the 'contact us' page on [www.klathrate.com](http://www.klathrate.com) via your Organisation's account manager because, as stated above, your use of our Services is likely subject to your Organisation's own policies..

**13.2.** In case you have any grievance related to the collecting, receiving, possessing, storing, dealing or handling of Personal Information provided by you, you may be subject to a fee of minimum \$10 or more according to meet our costs. You may contact our Grievance Officer at the following email address.

**[grievance@klathrate.com](mailto:grievance@klathrate.com)**

## **14. Account Closure :**

If you would like to stop using the Services, you should contact your Organisation. Similarly, if you stop working for or with the Organisation, the Organisation may suspend Your Account and/or delete any information associated with Your Account.

It typically takes about 90 days to delete an account on behalf of your Organisation after account closure, but some information may remain in backup copies for a reasonable period of time as directed by your Organisation. Please note, content you create and share on the Services is owned by your Organisation and may remain on the Services and be accessible even if your Organisation deactivates or terminates Your Account. In this way, content you provide on the Services is similar to other types of content (such as presentations or memos) that you may generate in the course of your work.