

## **Privacy Policy**

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GATEntry.com and GATEntry.in ("**Website**") are the property of and operated by Pioneer Digi Solutions Pvt. Ltd., a firm incorporated in India having its offices at Pioneer Tower, 169/8 Model town, Gurgaon, Haryana- 122001, India ("**GATEntry**").

GATEntry is committed to upholding the privacy and security of the information supplied by you during accessing and using the Website, mobile or software application (which for the purposes hereof shall be deemed to include the cloud-enabled dashboard to centrally manage the kiosk(s) at which the application is installed for visitors to sign-in) ("**Platform**") on a compatible device. This privacy policy ("**Privacy Policy**") explains how and why we: (i) collect and process personal data during the course of your interaction with the Website/Platform; and (ii) your rights that arise out of such interaction.

For the purposes of this Privacy Policy, "we", "our" and "us" shall mean GATEntry and "you" and "your" shall mean anyone who: (i) accesses or uses the Platform, or (ii) submits personal data on the Platform.

By accessing or using the Platform, you signify that you have read, understood and agree to be bound by this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time without prior notice and such changes shall be effective immediately upon posting the updated or modified Privacy Policy on the Platform and we shall not be bound to inform you of any modifications hereof. Your access and use of the Platform following any such change constitutes your agreement to follow and be bound by this Privacy Policy, as updated or modified. For this reason, we encourage you to review this Privacy Policy each time you access and use the Platform. This Privacy Policy applies to current and former users of the Platform. By accessing or using this Platform on any device, you consent to this Privacy Policy. If you have any queries or concerns with this Privacy Policy, please contact our Grievance Officer.

This Privacy Policy is incorporated into, and is subject to, GATEntry's terms of service available at **Term and Conditions**.

### **1. INFORMATION WE COLLECT AND HOW WE USE IT**

GATEntry will never collect any confidential financial details that you may provide on the Platform. All payment information barring the aforesaid (i.e. billing name, address and payment method) will be obtained and processed by the GATEntry's online payment gateway partner and/or banking partner, if any. Regardless of where you live, you consent to have your personal data transferred, processed and stored in India and/or a cloud-based hosting service provider.

### **2. COOKIES AND WEB BEACONS USED ON OUR WEBSITE**

2.1 You can, at your option, choose to reject and remove cookies from our Website by changing your browser settings, which might affect how our Website works. We may use any anonymized and aggregated data collected from you freely, subject to applicable law.

### **3. METHOD OF USING INFORMATION**

3.1 We may use the information submitted by you for reasons including, but not limited to, the following:

- 3.1.1 To help us provide you with the additional services through the Platform, from time to time;
- 3.1.2 To provide you with relevant information pertaining to the Platform;
- 3.1.3 To help provide personalized features;
- 3.1.4 Tailor the Platform to suit your interest;
- 3.1.5 Optimize the Platform for you based on your usage pattern;
- 3.1.6 To get in touch with you when necessary;
- 3.1.7 Administer contests, promotions, events, surveys or other features;
- 3.1.8 To inform/alert your personnel the arrival of a visitor;
- 3.1.9 To store details of visitor management, subject to applicable law or policy; and
- 3.1.10 for security purposes to protect GATEntry, other users or the Platform.

3.2 We use contact information internally to:

- 3.2.1 to verify your identity and process and confirm your payment of fees for your GATEntry account;
- 3.2.2 to send you confirmations, acknowledgments and other details pertaining to your use of the Platform;
- 3.2.3 to direct our efforts for improving existing services or promoting premium or alternate packages of services;
- 3.2.4 contact you as a survey respondent;
- 3.2.5 notify you of any changes to this Privacy Policy or the Terms of Service; and
- 3.2.6 Send you promotional materials regarding: (i) upcoming offers; and/or (iii) any information that we deem material in order for you to be a fully informed user of the Platform.

3.3 We may use your information as otherwise permitted by law.

### **4. YOUR RIGHTS & PREFERENCES AS A DATA SUBJECT IN THE EU**

4.1 In case you are a user entitled to protection under the European Union's (EU) General Data Protection Regulation (GDPR), we would like to inform you that our processes are GDPR compliant. Please find below the rights that you are specifically entitled to under the GDPR:

4.2 The data provided by you for our services will be processed by us for the purpose of rendering services to you, at your request. Where such data is not being used by us to render services to you, we shall explicitly seek your consent for using the same. You can choose to withdraw this consent at any time by writing to us at GATEntry Support.

4.3 Additionally, we may process your data to serve legitimate interests as described under GDPR. Accordingly, the grounds on which we can engage in processing are as follows:

4.4 In case you want to exercise the rights set out above, do feel free to contact our Grievance Officer whose details are set out below. If you believe we have used your personal data in violation of the rights above or have not responded to your objections, you may lodge a complaint with your local supervisory authority.

## **5. PUBLISHED CONTENT**

5.1 Any success stories, comments, messages, blogs, scribbles etc. posted/ uploaded/ conveyed/ communicated by you on the public sections of the Platform becomes published content. We may publish such published content on our Platform so long as you consent for the same. You may request that such published content be taken down at any time and we shall remove such published content upon your request. We shall remain responsible solely for any misuse of such published content by us.

## **6. INFORMATION WE GET FROM OTHERS**

6.1 We may receive data about you from other sources i.e., expert calls, smart watch, surveys, and such data may be added to our Platform from time to time. Such data may include your behaviour towards various content posted on our Platform from such other sources. We may use the data collected from such other sources for providing, testing, improving, or recommending the Services for your benefit.

## **7. RETENTION OF PERSONAL INFORMATION**

7.1 We will store any personal data we collect from you as long as it is necessary in order to facilitate your use of the services and for ancillary legitimate and essential business purposes – these include, without limitation, for improving our services, attending to technical issues, and dealing with disputes.

7.2 Your personal data will primarily be stored in electronic form. We may enter into agreements with third parties to collect, store, process your personal data under full compliance with applicable laws. In the event, you have any telephonic interactions with our customer representatives, the call data shall be recorded and stored on cloud-based servers for training and quality purposes.

7.3 Subject to GDPR and other applicable laws, we may retain your personal data, as required, even if you seek deletion thereof, if it is needed to comply with our legal obligations, resolve disputes and enforce our agreements. However, we shall remain obligated to accord the same degree of protection to such retained personal data.

## **8. TRACKING BY OUR ADVERTISEMENT PARTNERS**

8.1 Upon receiving and subject to your specific consent, we may share the data we collect from cookies or web beacons with our advertisement partners to track your visits, establish your non-personal and anonymized identity and present you with targeted advertisements about our services

## **9. TRANSFER OF INFORMATION**

9.1 In the ordinary course of business, we may employ other companies and people to assist us in providing certain components of our services in compliance with the provisions of this Privacy Policy. To do so, we may need to share your data with them.

9.2 Where applicable – if the entities to which these transfers are effected are not situated in countries deemed ‘adequate’ under the GDPR, we shall enter into appropriate Data Protection Addendums with such entities to ensure that your data is comprehensively protected. We have also put in place industry-standard technical and organizational measures (including robust data handling policies) to ensure that such transfers are completed in accordance with applicable laws.

9.3 Some of the examples of where we may sub-contract processing activities to third parties include, but are not limited to —hosting, data analysis, marketing assistance, processing payments, SMS and email service providers and providing customer service.

## **10. THIRD PARTY LINKS**

10.1 We may display links to third-party websites or applications on our Platform for advertising or providing you with relevant content. We may receive data whenever you visit a third-party link through our Platform which includes the date and time of your visit to the third-party website, the web address or URL, technical information about the IP address, browser and the operating system you use and, if you are logged your account, your username.

10.2 We will not be responsible for any actions by such third-party websites or applications if you choose to access them. If you provide any data to such website/application, please ensure you read their policies given that you will no longer be bound by this Privacy Policy in doing so.

## **11. COMPELLED DISCLOSURE**

11.1 In addition to the purposes set out in the Privacy Policy, we may disclose any data we collected or processed from you if it is required:

- 11.1.1 Under applicable law or to respond to a legal process, such as a search warrant, court order, or subpoena;
- 11.1.2 to protect our safety, your safety or the safety of others or in the legitimate interest of any party in the context of national security, law enforcement, litigation, criminal investigation or to prevent death or imminent bodily harm;
- 11.1.3 in connection with legal proceedings brought against us, our officers, employees, affiliates, customers or vendors; or

- 11.1.5 when we do a business deal or negotiate a business deal, or our assets are merged or acquired by the other business entity, or during restructuring of business or re-organization, we may have to share information provided by you with the other business entities. However, the information shared will be protected by suitable confidentiality arrangements with such third parties.

## **12. SECURITY OF YOUR PERSONAL INFORMATION**

12.1 We implement industry-standard technical and organizational measures by using a variety of security technologies and procedures to help protect your data from unauthorized access, use, loss, destruction or disclosure. When we collect particularly sensitive data (such as a credit card number or your geo-location), it shall be: (i) in compliance with applicable laws and regulations; and (ii) encrypted using industry-standard cryptographic techniques including but not limited to

## **13. ACCESS, CORRECTION & DELETION**

13.1 You may request access, correction or updation, and deletion of the data by contacting GATEntry Support. Kindly note that deletion of certain data or withdrawal of consent may lead to cancellation of your account with us or your access to our services..

13.2 Based on technical feasibility and subject to suitable identity verification, we will provide you with access to all your personal and sensitive personal data that we may maintain about you.

13.3 You may opt out of our marketing emails by clicking on the 'opt-out' link provided in the emails. However, in case you are a subscriber, we may still send you non-marketing transactional emails about your account with us.

## **14. GRIEVANCE OFFICER**

The name and contact details of our Grievance Officer, who you may contact if you have any concerns, complaints or feedback pertaining to this Privacy Policy or your personal data, are as follows: