

## **GENERAL DATA PROTECTION REGULATION**

### **What is GDPR?**

GDPR is a privacy and data protection law that regulates how European Union residents' data is protected by companies and enhances the control the European Union residents have over their data shared over any platform.

The GDPR is relevant to any globally operating company which may be accessible to the European Businesses or Citizens of the European Union directly or indirectly. The customers' data shared on our platform is important irrespective of where the customer is based out of, which is why as a responsible platform, we have implemented GDPR controls as our baseline standard for all our operations across the Globe. GDPR has taken effect from **25<sup>th</sup> May 2018**.

### **What is personal data?**

Any data that relates to an identifiable or identified individual, which may include but is not limited to Name, Age, Date of Birth, E-mail ID etc.

GDPR covers a broad spectrum of information that could be used on its own, or in combination with other pieces of information, to identify a person. Personal data extends beyond a person's name or email address. Additionally, it shall also include financial information, political opinions, genetic data, biometric data, IP addresses, physical address, sexual orientation, and ethnicity.

## **MONISA ENTERPRISE'S GDPR POLICY**

The Company has ensured that the platform shall be GDPR compliant as well as protect its user's through the platform.

As a responsible platform, we have constituted an Information Asset Register (IAR), which holds all details including but not limited to all the persona information or such other financial information shared across by you on our platform, which we will be treating it as an asset. The Register shall also provide details on various categories of personal data processed while you are using the platform and which shall be accessible by the Company or any particular department and the purpose for which the

data has been made accessible. It has comprehensive coverage of all our processes and procedures. We have also appointed a Data Protection Officer (DPO).

As a platform serving a wide range of clients across the globe, we will be conducting Data Protection Impact Assessments (DPIA) promptly post the incorporation of the platform. Based on the results we achieve, we have put in place appropriate controls on data processing and management on a timely basis. We as a platform will be conducting internal audits of our products, processes, operations, and management to identify the problems and work on the solutions.

Based on the DPIAs and internal audits, we will thoroughly look into and work on our data security methods and processes over time as and when required.

## COOKIES

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. By continuing to browse the site, you are agreeing to our use of cookies. Cookies contain information that is transferred to your computer's hard drive. You can set your browser to refuse all or some browser cookies, or to alert you when Websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. A list of the type of cookies we use is as follows;

1. **Strictly necessary cookies.** These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.
2. **Analytical/performance cookies.** They allow us to recognize and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
3. **Functionality cookies.** These are used to recognize you when you return to our Website. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
4. **Targeting cookies.** These cookies record your visit to our Website, the pages you have visited and the links you have followed. We will use this information to make our Website and the advertising

displayed on it more relevant to your interests. We may also share this information with third-parties for this purpose.

Please note that third-parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies. You can block cookies by activating the setting on your browser that 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 Website.

### **GOOGLE ANALYTICS**

We use Google Analytics to help us to understand how you make use of our content and work out how we can make things better. These cookies follow your progress through us, collecting anonymous data on where you have come from, which pages you visit, and how long you spend on the site. This data is then stored by Google to create reports. These cookies do not store your personal data.

The information generated by the cookie about your use of the Website, including your IP address, may be transmitted to and stored by Google on servers in the United States. Google may use this information for the purpose of evaluating your use of the Website, compiling reports on Website activity for us and providing other services relating to Website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using this Website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

The Google Website contains further information about Analytics and a copy of Google's privacy policy pages.

### **GOOGLE ADSENSE**

Google AdSense is a tool that allows Website publishers to deliver advertisements to site visitors in exchange for revenue calculated on a per-click or per-impression basis. To do this, Google **uses cookies and tracking technology** to deliver ads personalized to a Website user/visitor. In this regard the following terms are specified to the Users:

- a. Third-party vendors, including Google, use cookies to serve ads based on your prior visits to our Website or other Websites.

- b. Google's use of advertising cookies enables us and our partners to serve advertisements to you based on their visit to our Platform and/or other Websites on the Internet.
- c. You may opt-out of personalized advertising by visiting Ads Settings.
- d. All advertisements of third parties on our Website are for informative purposes only and neither the Website nor the Firm guarantees or bears liability for the authenticity of the advertisements.
- e. At no point will the Firm permit its competitors to advertise on the Website.
- f. You may visit the links in the advertisements at your own risk or choose to not accept the cookies permitting third parties to display their advertisements.

## **YOUR RIGHTS**

Unless subject to an exemption, you have the following rights concerning your data:

- a. The right to request a copy of your data which we hold about you;
- b. The right to request for any correction to any personal data if it is found to be inaccurate or out of date;
- c. The right to withdraw Your consent to the processing at any time;
- d. The right to object to the processing of personal data;
- e. The right to complain about a supervisory authority.
- f. The right to obtain information as to whether personal data are transferred to a third country or an international organization.

Where you hold an account with any of our services, you are entitled to a copy of all personal data which we hold concerning you. You are also entitled to request that we restrict how we use your data in your account when you log in.

## **GDPR PRIVACY RIGHTS**

The General Data Protection Regulation or GDPR gives certain rights to individuals in relation to their personal data. Accordingly, we are happy to offer transparency and access controls to help Users take advantage of those rights. As available, except as limited under applicable law, the rights afforded to individuals are:

- i. Right of access- the right to be informed of, and request access to, the data we process about

you,

- ii. Right to rectification – the right to request that we amend or update your data where it is inaccurate or incomplete,
- iii. Right to erasure- the right to request that we delete your data,
- iv. Right to restrict – the right to request that we temporarily or permanently stop processing all or some of your personal data,
- v. Right to object – the right to object to us processing your personal data on grounds relating to your particular situation. Along with the right to object to your personal data being processed for direct marketing purposes,
- vi. Right to data portability – the right to request a copy of your personal data in electronic format and the right to transmit that personal data for use in another part’s service,
- vii. Right not to be subject to automated decision-making, the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

### **CONFIDENTIALITY**

You further acknowledge that the Website may contain information that is designated confidential by us and that you shall not disclose such information without our prior written consent. Your information is regarded as confidential and therefore will not be divulged to any third party, unless if legally required to do so to the appropriate authorities. We will not sell, share, or rent your personal information to any third party or use your e-mail address for unsolicited mail. Any emails sent by us will only be in connection with the provision of agreed services, and you retain sole discretion to seek for discontinuation of such communications at any point in time.

### **OTHER INFORMATION COLLECTORS**

Except as otherwise expressly included in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties, whether they are on our Website or other sites throughout the Internet, different rules may apply to their use or disclosure of the information you disclose to them. To the extent that we use third party advertisers, they adhere to their privacy policies. Since we do not control the privacy policies of the third parties, you are subject to ask questions before you disclose your personal information to others.

### **OUR DISCLOSURE OF YOUR INFORMATION**

We may host surveys for survey creators for our Website who are the owners and users of your survey responses. We do not own or sell your responses. Anything you expressly disclose in your responses will be disclosed to survey creators. Please contact the survey creator directly to better understand how they might share your survey responses.

Information collected will not be considered as sensitive if it is freely available and accessible in the public domain or is furnished under the Right to Information Act, 2005, any rules made thereunder or any other law for the time being in force.

Due to the existing regulatory environment, we cannot ensure that all of your private communications and other personally identifiable information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (without limiting and foregoing), we may be forced to disclose information to the government, law enforcement agencies or third parties. Therefore, although we use industry-standard practices to protect your privacy, we do not promise, and you should not expect, that your personally identifiable information or private communications would always remain private. We do however assure you that any disclosure of your personally identifiable information shall be personally intimated to you through an email sent to your provided email address.

As a matter of policy, we do not sell or rent any personally identifiable information about you to any third party. However, the following describes some of the ways that your personally identifiable information may be disclosed:

- a. External Service Providers: There may be several services offered by external service providers that help you use our Website. If you choose to use these optional services, and in the course of doing so, disclose information to the external service providers, and/or permit them to collect information about you, then their use of your information is governed by their privacy policy.
- b. Law and Order: We cooperate with law enforcement inquiries, as well as other third parties to enforce laws, such as intellectual property rights, fraud and other rights. We can (and you authorize us to) disclose any information about you to law enforcement and other government officials as we, in our sole discretion, believe necessary or appropriate, in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us or you to legal liability.

### **ACCESSING, REVIEWING AND CHANGING YOUR PROFILE**

You can review and change the information you submitted except Email ID. An option for facilitating such change shall be present on the Website and such change shall be facilitated by the User. If you change any information, we may or may not keep track of your old information. We will not retain in

our files information you have requested to remove for certain circumstances, such as to resolve disputes, troubleshoot problems and enforce our terms and conditions. Such prior information shall be completely removed from our databases, including stored 'back up' systems. If you believe that any information, we are holding on to you is incorrect or incomplete, or to remove your profile so that others cannot view it, the User needs to remediate, and promptly correct any such incorrect information.

### **SECURITY**

We treat data as an asset that must be protected against loss and unauthorized access. We employ many different security techniques to protect such data from unauthorized access by members inside and outside the Firm. We follow generally accepted industry standards to protect the Personal Information submitted to us and information that we have accessed.

However, as effective as encryption technology is, no security system is impenetrable. Our Firm cannot guarantee the security of our database, nor can we guarantee that information you provide won't be intercepted while being transmitted to the Firm over the Internet.

### **SEVERABILITY**

Each paragraph of this Privacy Policy shall be and remain separate from and independent of and severable from all and any other paragraphs herein except where otherwise expressly indicated or indicated by the context of the agreement. The decision or declaration that one or more of the paragraphs are null and void shall not affect the remaining paragraphs of this privacy policy.

### **AMENDMENT**

Our Privacy Policy may change from time to time. The most current version of the policy will govern our use of your information and will always be on the Website. Any amendments to this Policy shall be deemed as accepted by the User on their continued use of the Website.

### **CONSENT WITHDRAWAL, DATA DOWNLOAD & DATA REMOVAL REQUESTS**

To withdraw your consent, or to request the download or delete your data with us for any or all our services at any time, please email to "[sahil@monisaenterprise.com](mailto:sahil@monisaenterprise.com)".

### **CONTACT US**

If you have any questions or concerns regarding this privacy policy, you should contact us by sending an e-mail to “[Dr Sahil - sahil@monisaenterprise.com](mailto:Dr Sahil - sahil@monisaenterprise.com)” or by writing to us at:

**M/s MoniSa Enterprise**

***C/o Pushapa Devi, Bhati Vihar, Gorakhpur, Uttar Pradesh, India***

***Mobile Number - +918079061002 ,+918168752880***

