

Privacy Policy

Effective Date: April 6, 2019

Document Purpose

MGC Global Risk Advisory LLP ('MGC Global' or 'the Company' or 'we') believes that the responsible use of personal information collected on its web site is critical to its business objectives and reputation. As part of our commitment to privacy, we have adopted this Data Privacy Policy ('Policy'). The extent and type of information we receive from you on our web site depends on the information provide to us. The purpose of this Policy is to ensure that all individuals whose Personally Identifiable Information is collected by MGC Global are well informed about how and why MGC Global collects Personally Identifiable Information and what rights are available to them under the General Data Protection Regulation ('GDPR').

Document Scope

This Policy applies to all business units, processes and systems in all countries in which MGC Global conducts business and has dealings or other business relationships.

This Policy applies to all employees, directors, contractors, consultants, advisors or service providers that may collect, process, or have access to Personally Identifiable Information of individual data subjects. It is the duty of all the above to familiarize with this Policy and ensure adequate compliance with it.

I) Introduction & notice

a) Introduction

MGC Global respects individual privacy and values the confidence of its customers, employees, job applicants, business partners/ vendors. The Company collects, uses and discloses Personal Identifiable Information in a manner consistent with the laws of the countries in which it does business. The Company also has a tradition of upholding the highest ethical standards in its business practices.

We have implemented industry-standard security safeguards designed to protect the Personal Identifiable Information that you may provide. We also periodically monitor our system for possible vulnerabilities and attacks, consistent with industry standards.

Your privacy is important to us. We believe it is pertinent for you to know how we treat the personally identifiable information, that we receive from you. This privacy policy explains what Personal Data we collect from you, through our interactions with you on our website, and how we use that data.

IF YOU DO NOT AGREE WITH THE TERMS IN THIS PRIVACY POLICY, DO NOT USE THE SERVICES AND SITES. CONTINUED USE OF THE SERVICES AND SITES CONSTITUES YOUR FREELY GIVEN, SPECIFIC AND INFORMED CONSENT AND AGREEMENT TO YOUR PERSONAL DATA BEING PROCESSED PURSUANT TO THIS POLICY.

b) Definitions

- "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the

controller or the specific criteria for its nomination may be provided for by Union or Member State law.

- “Data Subject” means an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- “Joint Controller” means two or more controllers jointly determining the purposes and means of processing Personal Data.
- “Personal Data” and “Personal Information” means any information relating to an individual that can be used to identify that individual either on its own or in combination with other readily available data.
- “Pixels” means small, graphic images on web pages, web-based documents, or in email messages that allow us or third parties to monitor who is visiting our Sites (or other third-party sites) or if an email has been read.
- “Processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- “Special Categories of Data” means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.
- “We”, “our”, and “us” in this Privacy Policy refer to MGC Global and any legally empaneled sub-processor or contractor delivering the services and products herein.
- “You” means the individual to whom any given Personal Data covered by this Privacy Policy refers.

II) Collection of Personal Identifiable Information

a) Authorized Users

The Sites are not intended for children under the age of 16. If you are under 16 years old, please do not provide information of any kind whatsoever on the Sites. If you are the parent of a child under 16 and believe your child has provided us with personal information, please contact us via Section XI below and we will remove that information.

b) Information you actively submit

- If you sign up on our site for our blog/newsletter, you may provide contact information such as your name, email address, mailing address and company affiliation.
- Our website is also used to source talent for the firm and requires candidates to submit personal data with reference to their candidature. This information is used by MGC Global strictly for resourcing / hiring purposes.
- When you consent to our collection of your personal data, we act as a controller of that data whether collected on our Sites from you or received from our channels. Our customers may receive personal data collected pursuant to your opt-in consent on our sites and as such, our customers are joint controllers of that data.
- We do not seek to collect or otherwise process your sensitive Personal Identifiable Information for any other purpose other than what is legitimate; and we do so in accordance to applicable law.
- We do not collect or otherwise process Personal Identifiable Information about race, religion, sexual orientation, health or any other information that is deemed to be sensitive in the ordinary course of business except for employees and job applicants.

c) Modes of collection of data

PII collected either electronically or physically, including but not limited to emails, cold calls, resumes, social media networking sites, subscription to databases and prospective candidate search engines, etc.

Policy statement

- MGC Global shall protect its customers, employees and job applicants' information / data deemed as 'Personal' and / or 'Private'.
- 'Customers' records shall not be sold, traded or disclosed to any third party except as may be required by law.
- Any information that is provided to us in the course of interacting with our project staff or support departments shall be held in strict confidence. This includes information (including, but not limited to email addresses, phone numbers, postal addresses, bank account details, credit card numbers and medical history), as well as any data that is supplied to us in the course of business engagement.

d) Usage and browsing information your device transmits

You can visit most of our Sites without registering or actively submitting personal data to us. If you do not register, general technical user data, such as your device's Internet Protocol (IP) address, operating system and browser type, and the date and time of your visit, may be automatically collected through the use of "cookies" (small files that are stored on your computer by a website to give you a unique identification) or other technologies. Cookies also keep track of services you have used, record registration information regarding your login name and password, record your preferences and keep you logged into the MGC Global's site.

We may use, and allow third parties to use, Pixels (sometimes called web beacons) on our Sites (or other third-party sites). Pixels may be linked to your Personal Information, and they collect the IP address of the device to which the web beacon is sent (for geolocation lookup), the URL of the page the web beacon comes from, the user agent string (for device lookup), and the time it was viewed.

We may collect traffic information and data on and from the use of third-party sites on behalf of our customers. MGC Global may use a Pixel or cookie to examine what is happening on third-party websites, including programs and sites with marketing and advertising partners, to improve the understanding of site traffic at a granular level, market research effectiveness and other services provided.

e) Combination & synchronization

We may combine and synchronize information that your device transmits, information that you actively submit and information that we obtain from third party sources (including web publishers, advertisers, data brokers and online service providers that may have obtained information from you or your devices via cookies, Pixels, and other tracking technologies).

f) Cookie opt out

If you do not wish to participate in any of MGC Global's online measurement, please click on the decline button to receive an opt-out cookie. MGC Global's platforms and systems are cookie based, so for the opt-out to work for you, your browser must allow third party cookies. Also, you can set your browser to warn you before accepting them and refuse the cookie(s) when your browser warns you, or you can set your browser to refuse all cookies from the website (or certain parts of the website), and/or you can

delete cookies received from the website using your browser, for instance. Cookie handling instructions vary depending on the browser being used, and MGC Global does not assume responsibility for any undesired results arising from altering your browser's cookie handling settings.

g) Business information

We do collect employee contact names, addresses, phone numbers and email addresses of our business partners, including buyers, suppliers and vendors, for the administration of our business relationships. If you feel that your Personal Data or personally identifiable information is being collected inappropriately, please notify us at support@mgcglobal.co.in.

III) Purpose & use of collected Personal Identifiable Information

MGC Global uses the data collected for two main purposes, described in detail below to operate its business including the official website and to send communications, including promotional communications.

To operate our business including the official website: We use data collected to assess queries, requirements, and process requests for services as well as to assess website usage analysis.

Communications: We use data collected to communicate with you and personalize our communications with you. Additionally, you can sign up for email subscriptions and choose whether you wish to receive promotional communications from MGC Global by email, SMS, post and telephone or other means of communication.

We may process your Personal Identifiable Information to contact you via email, telephone, SMS or other methods of communication to provide you with information regarding our offerings that may be of interest to you. We may send information to you regarding our offerings, that may be of interest to you, using the contact details that you have provided to us and always in compliance with applicable law.

IV) European data protection rights – GDPR

When we process Personal Data about you, we do so with your consent and/or as necessary to provide the website you use, operate our business, meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfil other legitimate interests of MGC Global as described in this privacy policy.

Below, you will find additional privacy information that you may find important. MGC Global adheres to applicable data protection laws viz GDPR in the European Union, which if applicable, includes the following rights:

- If the processing of Personal Data is based on your consent, you have a right to withdraw consent at any time for future processing;
- You have a right to request us to rectify your Personal Data;
- You have a right to access your Personal Data;
- You have a right to request us that your Personal Data be erased, subject to certain exceptions;
- You have a right to object to the processing of your Personal Data; and

- You have a right to lodge a complaint with a data protection authority.

V) Information retention & accuracy

We take reasonable steps to ensure that Personal Identifiable Information we receive, process, or maintain is accurate, complete, and reliable for its intended use. We rely on the accuracy of the information provided directly to us but accept responsibility for the management and confidentiality of the Personal Identifiable Information collected.

In general, we keep Personal Identifiable Information only if we need it to provide you the services you requested. We may also process data on behalf of third parties who have engaged us. We keep Personal Identifiable Information processed on behalf of third parties for as long as needed to provide services to third party in question. However, we reserve the right to retain Personal Identifiable Information for any period required by law or to comply with our legal obligations, resolve disputes, and enforce our agreements.

VI) Data Minimization

We take every reasonable step to ensure that your Personal Identifiable Information that we process is limited to the purposes set out in this policy or as required to provide you services or access to the services.

VII) Sharing of Personal Information and Accountability for Onward Transfer

a) Information associated with your name is shared in accordance with the procedures stated as follows:

- With your consent.
- We use affiliated and unaffiliated service providers that help us deliver our service and run our business subject to confidentiality agreements.
- We will disclose data as required by law including to meet national security requirements or to protect you, other users, us or third parties from harm, including fraud, data security breaches or where someone's physical safety seems at risk.
- In a reorganization or sale of our company or assets, your data may be transferred, subject to the acquirer accepting the commitments made in this Privacy Policy and in compliance with applicable law.

We share aggregated demographic information about our users with third parties. This information is linked to randomly assigned user IDs. Your user ID is linked to demographic information about you (excluding your first name and last name) that potentially could include Special Categories of Data. You consent to us collecting and sharing this information with our customers and other third parties.

When MGC Global does share your Personal Information with third party service providers and/or sub-processors, MGC Global will:

- a) transfer such data only for limited and specified purposes;
- b) ascertain that the sub-processor is obligated to provide at least the same level of privacy protection as is required by these Principles;
- c) take reasonable and appropriate steps to ensure that the sub-processor effectively processes the Personal Information transferred in a manner consistent with the organization's obligations under these Principles;

- d) require the sub-processor to notify MGC Global if it decides that it can no longer meet its obligation to provide the same level of protection as is required by these Principles;
- e) take reasonable and appropriate steps to stop and remediate unauthorized processing; &
- f) provide a summary or a representative copy of the relevant privacy provisions of its contract with that sub-processor to the Department of Commerce upon request.

b) International transfers

If you are visiting this website from a country other than the country in which our servers are located, your communications with us will result in the transfer of information across international boundaries. By visiting this website and communicating electronically with us, you consent to such cross-border transfers.

VIII) Security of Personal Data

MGC Global is committed to protecting the security of your Personal Data. We use a variety of security technologies and procedures to help protect your Personal Data from unauthorized access, use or disclosure.

IX) Protection of Personal Data

MGC Global uses reasonable security measures to prevent loss, misuse and alteration of information under our control. However, we cannot guarantee the security of information on or transmitted via the Internet. We rely on various security procedures and systems to ensure the secure storage and transmission of data, including encryption and authentication technology licensed from third parties, to effect secure transmission of confidential information. Additionally, we have absolutely no control over the security of other sites you might visit, interact with or do business with.

If we learn of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. MGC Global may post a notice on the MGC Global Site if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive a free written notice of a security breach (or to withdraw your consent from receiving electronic notice) you should notify us.

X) Limits to Your Privacy

Our Sites may contain links to external websites, and areas where you can provide information to third-parties. These are provided for your convenience only, and we do not have control over the content or privacy and security practices and policies of such third parties or third-party sites. Any Personal Information you provide in such areas, and on such linked pages is provided directly to that third party and is subject to that third party's privacy policy. Please learn about the privacy and security practices and policies of external websites and third-parties before providing them with Personal Information.

XI) Choice Regarding Collection, Use & Distribution of Personal Information

You can choose to opt-out whenever your Personal Information is (i) to be disclosed to a third party or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individuals.

If you choose to opt-out, please contact us via email at support@mgcknav.com. In such an event, you will be only able to access public areas of the Sites and may be limited in the use of MGC Global's sites. In certain cases, limiting the use and disclosure of your personal data may impact functionality or prevent the use of MGC Global products or services.

XII) Changes to Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will prominently post those changes here and any other place we deem appropriate, so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make any material changes, we will notify you by means of a notice on this site prior to the change becoming effective. We will use information in accordance with the privacy policy under which the information was collected.

We use a self-assessment approach to address compliance with this Privacy Policy, verifying periodically that the policy is accurate, comprehensive, and addresses the privacy requirements applicable to the markets we serve. Periodically, our operations and business practices are reviewed for compliance with corporate policies and procedures governing the confidentiality of information.

XIII) How to contact us

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the processing of user information carried out by us, or on our behalf, please contact us by email at info@mgcglobal.co.in or write to us at support@mgcglobal.co.in.