

Privacy Policy
For the Users of
www.jkcement.com

# **Owner and Data Controller**

JK Cement Limited Padam Tower Plot No. 19, DDA Community Center Phase I, Okhla, New Delhi - 110020

Owner contact email: CIO@jkcement.com

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# 1. Applicability

This privacy policy shall be applicable to everyone who accesses and uses www.jkcement.com and the web pages contained within, including but not limited to external Legal entities in any form or manner,

JK Cement customers, third party service providers, vendors, associates, etc. who use or access this website, themselves or through authorised representatives or its legal heirs, representatives, successors, assignees, etc.

# 2. Types of Data collected

By accessing or using this site, you agree and consent to be bound by this privacy policy and if you do not wish to be bound by this policy, please do not access or use the site.

Among the types of Personal Data that this Website collects, there are: Name, email, mobile number, state and district.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy.

Personal Data may be freely provided by the User, or in case of Usage Data, collected automatically when using this Website.

Unless specified otherwise, all required Data requested by this Website shall be mandatory in nature and failure to provide this Data will make it impossible for this Website to provide its services. In case, where this Website specifically states that requirement of some Data is not mandatory, Users are free to not to submit this Data without any consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory, are welcome to contact the Owner of this website.

Any use of Cookies – or of other tracking tools – by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

# 3. Mode and place of processing the Data

#### 3.1 Methods of processing

The Owner takes reasonable effort to ensure that appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration). The updated list of these parties may be requested from the Owner at any time.

### 3.2 Legal basis of processing

JK Cement will not sell, share, rent or otherwise distribute/ trade your sensitive personal information, collected through www.jkcement.com or on any of the pages contained within or information provided by you when you avail any of the services provided by JK Cement, to third parties. To the extent permitted by law, JK Cement may record and monitor your communications with us to ensure compliance with our legal and regulatory obligations and our internal policies. This may also include the recording of telephone conversations.

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;

- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.
- Additionally, in the event of a reorganization, merger, sale, joint venture, assignment, transfer or
  other disposition of all or any portion of our business, assets or stock (including in connection with
  any bankruptcy or similar proceedings), we may transfer the Personal Information we have
  collected to the relevant third party.
- We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation.
- Sharing of data is not an infringement of GDPR (General Data Protection Regulation) by way of displaying PII (Personal Identifiable Information) to fellow users of the website.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### 3.3 Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located, it may be necessary to transfer your personal data to Owner's affiliates, and/or third party service providers located in India and throughout the world for the purposes outlined within this Privacy Statement. Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

#### 3.4 Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

# 4. The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as, Registration and authentication. For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

# 5. Cookie Policy

Cookies are pieces of information stored directly on the computer or mobile device that you are using. Cookies allow us to collect information such as browser type, e-mail address when you are logged-in to your e-mail from the browser you are using, time spent on the Online Services, pages visited, including our websites, referring URL, language preferences, and other aggregated traffic data.. It is a small element of data that our website sends to your computer which may be used to provide you with specific information and permits our website to recognize you when you return to the Site. Cookies help us understand your areas of interest in our site and do not track your individual information.

# 6. Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

## 6.1 Registration and authentication provided directly by this Website

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users, hence shall not be treated as an infringement of GDPR (General Data Protection Regulation) by way of displaying PII (Personal Identifiable Information) to fellow users of the website, etc..

## **Direct registration/authentication (this Website)**

The User registers by filling out the registration form and providing the Personal Data directly to this Website.

Personal Data processed: username; password

#### 6.2 Enquiry/Feedback Form

The very object and purpose of requesting such information is only to better understand your needs and provide you with our services that we believe may be of value to you. The Personal Data is collected and stored for registration or identification purposes only

#### Feedback/Enquiry (this Website)

The User fills out the Enquiry form and providing the Personal Data directly to this Website.

Personal Data processed: Name, Email, Mobile No., State, District, Pin code

JK Cement will not sell, share, rent or otherwise distribute/ trade your sensitive personal information, collected through www.jkcement.com or on any of the pages contained within or information provided by you when you avail any of the services provided by JK Cement, to third parties. To the extent permitted by law, JK Cement may record and monitor your communications with us to ensure compliance with our legal and regulatory obligations and our internal policies. This may include the recording of telephone conversations.

# 7. The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner. In particular, Users have the right to do the following:

- 1. **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- 2. **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.

- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- 4. **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- 5. **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- 6. **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- 7. Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on precontractual obligations thereof.
- 8. **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

## 7.1 Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

#### 7.2 How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

# 8. Additional information about Data collection and processing

## 8.1 Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

#### 8.2 Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

## 8.3 System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) use other Personal Data (such as the IP Address) for this purpose.

### 8.4 Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

#### 8.5 Use by minors

We do not intend for our website or online services to be used by anyone under the age of 18. If you are a parent or guardian and believe we may have collected information about a child, please contact us on the details provided in the beginning of the policy.

## 8.6 How "Do Not Track" requests are handled

This Website does not support "Do Not Track" requests. To determine whether any of the third-party services it uses honour the "Do Not Track" requests, please read their privacy policies.

## 8.7 Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

#### 8.8 Contact Information

You may at any time, contact directly with all questions and suggestions concerning data protection by e-mailing at CIO@jkcement.com