

# PRIVACY POLICY

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This Privacy Policy is incorporated by reference in the Terms and applies to all Your Personal Information collected by INDIA PEPPER AND SPICE TRADE ASSOCIATION(IPSTA) and COFBA Networks.

This Privacy Policy sets out Our commitment to protecting the privacy of Personal Information You provide to us, or We otherwise collect about You. This Privacy Policy explains the types of Personal Information We collect about You, how We collect, use, disclose, secure, process and store Your Personal Information and Your rights in relation to Your Personal Information.

By using Our Platform and providing Us with Personal Information, You consent to the terms of this Privacy Policy.

## 1. Types of Personal Information We collect

1.1. "Personal Information" means information We hold which is identifiable as being about You.

1.2. The Personal Information We may collect about You includes:

- (a) Identity Details: full name.
- (b) Contact details: email address and phone number.
- (c) Location details: address.
- (d) Financial information (if applicable): credit card details, bank transfer details and payment processor details.

## 2. How We collect Your Personal Information

2.1. We may provide to You a Privacy Collection Notice ("Notice") at the time We collect Personal Information from You to explain how We will use the information We are asking for. The Notice may be written or verbal. 2.2. We may collect Your Personal Information in the following ways:

- (a) If You provide this information to Us in the course of Your Use of Our Platform by: accessing, registering, viewing, interacting with, communicating or posting on Our Platform.
- (b) If You send it directly to Us by email or other means or otherwise communicate with Us.
- (c) If You change Your Account details on Our Platform.
- (d) From other Users on Our Platform.
- (e) If You respond to any surveys and/or promotions on Our Platform.

(f) If You provide financial or credit card information.

(g) From third parties, also subject to their own privacy policies.

### **3. How We use Your Personal Information**

We may use Your Personal Information for the following purposes:

(a) Facilitating the creation of an agreement with You for Your Use of Our Platform (see Our Terms).

(b) Processing your request to register for a User Account.

(c) Confirming Your identity for the purposes of using Our Platform.

(d) Enabling Your Use of Our Platform.

(e) Providing technical or other support to You.

(f) Conducting data analysis, research and otherwise building and improving Our Platform and services.

(g) Contacting You by phone, SMS, email or mail to provide information, updates and marketing offers to You in relation to Our Platform and services (unless You have opted out from such communications).

(h) Responding to Your enquiries or complaints.

(i) Sending any notices to You in relation to the Terms.

(j) For debugging, testing and otherwise operating Our Platform.

(k) For internal record keeping and administrative purposes.

### **4. When We may disclose Your Personal Information**

4.1. We may disclose Your Personal Information in good faith and if reasonably necessary in the following circumstances:

(a) To Our employees, officers and subcontractors.

(b) To any third party service providers who assist Us in relation to Our Platform and services, including (without limitation): insurers, professional advisers, debt collectors, agents, business partners and suppliers (such as: cloud hosting, data storage, server providers, networking and related providers, SMS providers, payment and banking providers, marketing and analytics providers and security providers).

(c) To an otherwise unrelated third party, for marketing purposes, but only with Your consent.

(d) To comply with legal requirements, including: any law, regulation, court order, subpoena or warrant, in relation to legal proceedings or a law enforcement authority's request or to resolve any disputes We have.

(e) To protect the copyright, trade marks, legal rights, property or security of Our Company, Our Users or third parties.

(f) To anyone to whom Our business or assets (or any part of them) are, or may (in good faith) be, transferred.

4.2. Where We disclose Your Personal Information to third parties, We will request that the third party follow this Privacy Policy regarding the handling of Your Personal Information.

4.3. If We provide You with information about another User, You agree You will use the information only for the purposes it is provided to You. You must not disclose, sell, rent or distribute a User's information to a third party for purposes unrelated to Our Platform and Services. Additionally, You may not use information for marketing purposes, via electronic or other means, unless You obtain the consent of the specific User to do so.

## **5. How We secure Your Personal Information**

5.1. We have in place the following processes to secure Your Personal Information and prevent unauthorised access, misuse, modification, interference, disclosure or loss of Your Personal Information:

(a) Limits on access to Your Personal Information within Our Company and regular audits and monitoring of internal staff with access to Your Personal Information.

(b) Encryption of all data when it is transferred to Our service providers.

(c) Other suitable physical, electronic and managerial procedures.

5.2. The transmission and exchange of Your information is carried out at Your own risk. We cannot guarantee the security of any information that is transmitted to or by Us over the Internet. Although We take reasonable measures to safeguard against unauthorised disclosures of information, We cannot assure You that Personal Information that We collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

## **6. How We process and store Your Personal Information**

6.1. Our Platform is hosted and stored on a third party server in Singapore. We securely transfer all data on Our Platform (including all Your Personal Information) to Our server in Singapore. You hereby consent to this transfer.

6.2. Your Personal Information may be processed by Our staff in locations outside of India, including Australia. You hereby consent to this processing.

## **7. Cookies and web beacons**

7.1. We may from time to time use cookies on Our Platform. Cookies are very small text files which are placed in Your computer's browser to store Your preferences. Websites use cookies to identify You when You come back to the site and to store details about Your Use of the site.

7.2. Most web browsers automatically accept cookies but You can choose to reject cookies by changing Your browser settings, however this may prevent You from taking full advantage of Our Platform.

7.3. Although cookies do not access information stored on Your computer or any Personal Information (for example: name, address, email address or telephone number), they do allow collection of identifiable information about You. Cookies allow third parties, such as Google and Facebook, to cause Our advertisements to appear on Your social media as part of Our retargeting campaigns. If and when You choose to provide Our Platform with Personal Information, this information may be linked to the data stored in the cookie.

7.4. We may use web beacons on Our Platform from time to time. Web beacons are small pieces of code placed on a website to monitor the visitor's behaviour and collect data about the visitor's viewing of a website. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

7.5. We may use cookies or web beacons to collect the following information about You or Your Use of Our Platform:

(a) Metadata: IP address, computer and connection information, referring website, standard web log information, language settings or timezone.

(b) Device information - device identifier, device type, device plugins or hardware capabilities.

(c) Location: GPS position. A permission request will be displayed when Our Platform requests this data.

(d) Actions - pages viewed, buttons clicked, time spent viewing or search keywords.

7.6. We may use cookies or web beacons for the following purposes:

(a) Analysing website traffic to help Us provide a better user experience for You.

(b) Using third party services such as Google Adwords or Google Analytics to provide relevant advertisements to Users on Our Platform.

## **8. Your rights**

8.1. If You do not consent or withdraw Your consent to the use of Your Personal Information by Our Platform in any way, this may affect Your Use of Our Platform.

8.2. You can withdraw Your consent at any time to receive any communications from Us in respect of Our Platform and services or to receive any marketing. To unsubscribe from Our email database or opt-out of communications (including marketing communications), please contact Us by email or opt-out using the opt-out facilities provided in the communication.

8.3. You have the right to access a copy of and correct the Personal Information We hold about You if You believe the information is inaccurate, out of date, incomplete, irrelevant or misleading. You may do this by signing into Your Account and updating Your User information or contacting Us by email: [INSERT COMPANY EMAIL]. A small administrative fee may be payable for the provision of such information to You.

8.4. We reserve the right to refuse to provide You with Personal Information that We hold about You, in certain circumstances.

8.5. We are not liable for the privacy practises of any third party websites which link from or to Our Platform. This Privacy Policy does not apply to those linked websites. You should read the privacy policies of third party websites before using them.

8.6. Most Personal Information and other information provided by You through Our Platform cannot be deleted as they relate to contracts between Users, document financial transactions (if applicable), and are used in protecting other Users on Our Platform. In the case of non-personal data that can be linked and aggregated with personal data, it will either be erased or otherwise anonymised from the personal data.

## **9. Privacy complaints**

9.1. If You have any questions or complaints about Our privacy practises, please send an email to Us: [Contact@ConnectOneClub.com](mailto:Contact@ConnectOneClub.com).

9.2. We will respond to your written complaint within thirty (30) days of receipt.

## **10. Updating this policy**

We may change this Privacy Policy at any time in Our absolute and sole discretion and all changes will be effective immediately upon Our posting of the updated Privacy Policy on Our Platform. We may also notify You by email. We recommend You check Our Platform regularly to ensure You are aware of Our current Privacy Policy.

## **11. Contact details**

Subeesh Sathyanesan

Email: [support@connectoneclub.com](mailto:support@connectoneclub.com)

Address: Unit m 15, Kristal campus10 Yemere village,

Sarjapur road Banglore india, 562125