## Data protection statement

When you visit our website, we collect some information related to your device, your browser and to the way you navigate our content, based on your free and informed consent.

We will use this information to help us manage our website and improve our marketing and communication strategy.

Because some of this information may ultimately relate to you, it is collected, handled and secured in accordance with the Information Technology Act, 2000, read along with Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011.

This statement applies to all visitors of our website.

## What information will we collect?

1) When you visit our website, we gather information that relates to your device, your browser and to the way you navigate our website content, such as:

- the Internet Protocol (IP) address of your device
- the IP address of your Internet Service Provider
- device screen resolution
- device type (unique device identifiers), browser and operating system versions
- geographic location (country only)
- preferred language used to display
- the date and time of website access
- the internet address from which you were directly linked through to our website, the control system that you use
- the parts of the website that you visit

- the pages of the website that you have visited and the information that you viewed
- the hyperlinks you have clicked
- information on the types of appliance that you used to visit the site
- the material that you send to or download from our website

2) If you choose to download our reports or white papers; or subscribe to our newsletters, news, events and alerts; or submit an inquiry, we may ask you to fill out a form with information including your name, e-mail address, job title and company. With this information, we will be able to relate the information listed above about your device, your browser and to the way you navigate our website content directly to you.

# How will we use the information related to our website visitors?

We will use information pertaining to your device, your browser and your navigation history on our website content primarily to manage the website and for system administration purposes.

We will use this information for web analytics, to help us make decisions related to the content we present, and how we present it (for instance, we can present you with content that relates to Nadal in the country from where you are accessing our website), in order to improve our website and provide our visitors with a better browsing experience.

If you choose to download our reports or white papers, or subscribe to news, events and alerts, we will use the information you provide us to send you the content requested, to communicate with you (including, where you agree, to send you related information that might be of interest) and to improve our marketing and communication strategy.

If you choose to submit an inquiry, we will use the information you provide us to follow up with you on your request.

On what legal basis will we process information related to our visitors?

We will only collect and further process information related to you based on your informed consent and on our legitimate interest of improving our marketing and communications strategy.

#### How we will handle your information?

We use cookies and web analytics tools to collect and analyse information related to the way our visitors use our website.. We will use this information at an aggregated level in a way that can no longer be related back to you. The only exceptions are when you download our reports or white papers or subscribe to our newsletter, in which case we will be able to relate the information about your device, your browser, and your navigation history of our website content directly to you, using the information you provide us.

Cookies are small text files that will be stored on your device via your browser, primarily to enhance your convenience of using the site, to customize the content and to enable certain functions. You can read more about this in our cookie statement.

Web analytics refers to the analysis of website traffic and browsing trends that can help us understand how our visitors browse through our website.

We and our service providers have various security measures in place to protect the information we get when you browse our website as well as the information you provide us when you download our reports or white papers; or to register to news, events and alerts; or submit an inquiry. For example, we use encryption, firewalls, intrusion detection software and manual security procedures to help protect the accuracy and security of the data we hold. However, while we do our very best to protect the data we hold, please note the Internet is not 100% secure. We, therefore, encourage you to exercise caution when using the Internet.

#### How long will we keep your information for?

The information we collect related to your device, your browser, and to the way you navigate our website content for web analysis purposes is only kept on an aggregated level. This means that once collected, this information is combined with other related information in a way that it is no longer possible to identify the person to whom it relates to anymore. The information you provide us when you download our reports or white papers or when you register to news, events and alerts is kept for 2 years after last contact.

However, information related to some inquiries (such as those related to compliance) may be kept for a longer retention period subject to applicable law.

# Who has access to your information?

We may share your information with other Nadal Group companies within the framework of Nadal's global brand and marketing strategy.

Our third parties service providers who carry out certain tasks on our behalf and according to our instructions may also have access to information related to our website visitors, to the extent necessary to provide us with their services. These third parties include our IT service providers, who carry out tasks in the fields of hosting, database management, website management, maintenance services, alert services, web analyses and the handling of incoming inquiries and data analyses.

Our website uses analytics tools provided by specialized third parties to help us diagnose technical problems, analyse the traffic to our website, analyse trends, observe and measure how our visitors engage with our website.

Nadal Group Companies, our third parties services providers and the analytics tools providers we use may have access to the information related to your device, your browser and to the way you navigate our content in accordance with this statement from different countries, including in countries outside the European Union.

We have put in place appropriate safeguards to ensure your personal data is adequately protected.

# Your data protection rights

You may, at any time, request us to:

• Review the information we hold about you

- Correct this information if it is factually wrong
- Erase your personal data or restrict the processing of your personal data
- Receive the personal data which you have provided us via the forms, in a structured, commonly used and machine-readable format
  We will deal with your request with special care to ensure your rights can be exercised effectively. We may ask you for proof of identity to ensure that we are not sharing your personal data with anyone else but yourself!

You must be aware that, in particular cases (for instance, due to legal requirements) we may not be able to make your request effective right away.

You will hear from us within one month of your request, on the actions taken.

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

#### How you can withdraw your consent

If you register to receive news, events and alerts, or reports, you can always withdraw your consent and opt-out from receiving further communications by following the unsubscribe instructions in each email.

You can prevent your browser from storing cookies in your browser settings.

You can also delete the cookies from your device at any time via the browser settings.

However, you must understand that withdrawing your consent will not affect the lawfulness of processing based on consent before its withdrawal nor further processing of the same data under other legal basis such as contract or compliance with a legal obligation to which Nadal is subject.

# Changes to the Data Protection Statement

We may update the Data Protection Statement from time to time. You can see the date on which the last change was made below in this statement. We advise you to review our data protection statement on a regular basis so that you are aware of any changes.

## Contact us

If you have any questions about this policy or any privacy concerns, or would like to exercise your rights, or obtain further information about the safeguards we have in place so that your personal data is adequately protected, please contact us.

Deputees of Nadal can contact <u>hr@nadalbusiness.com</u>for modification of their data.

If there are complaints in India as regards privacy violations, it shall be reported to <u>hr@nadalbusiness.com</u>

This statement was updated on: 03 November 2021.