

Privacy Policy

Objective:

The objective of this Privacy Policy is to protect the privacy of persons dealing with Head Digital Works Private Limited ("HDWPL") and store Information in accordance with the legal requirements and in order to mitigate operational risks.

Overview:

References to "we", "our" or "us" in this Policy refer to HDWPL, that is responsible for processing your personal data, as may avail from us.

For the purposes of this Policy, any reference to "Services" is a reference to all the products and services offered by HDWPL offline, and any reference to "Sites" is a reference to any of the HDWPL websites (including any mobile version of such website) or a brand name that we own. "Terms of Services" refer to the terms and conditions of A23 as set out on a23.com.

HDWPL provides products and services via multiple domains. When you visit any of our sites, our web servers record and store the request. This information assists HDWPL to improve the structure of its web sites and to monitor their performance.

HDWPL may use 'cookies' on various web sites. Cookies are an industry standard and most major web sites use them. A cookie is stored on your computer. Usually, cookies are used as a means for HDWPL's web sites to remember your preferences. As such, HDWPL's web sites.

In some cases, cookies may collect and store personal information about you. HDWPL extends the same privacy protection to cookies or from other sources. You can adjust your Internet browser to disable cookies or to warn you when cookies are being used. You will be able to access certain areas of our web sites or take advantage of the improved web site experience that cookies offer.

HDWPL also collects Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify and collect and manages IP addresses as part of the service of providing internet session management and for security purposes.

Assurance of Privacy:

Your privacy is of utmost importance to us and we at HDWPL hereby assure you that we enforce the highest levels of confidentiality in accordance with currently applicable legislation regarding the protection, security and confidentiality of personal data. In this Policy, we describe how we collect, use, store, and disclose your personal data. We also outline the rights you may have in respect of your personal data held by us. The Policy relates to your personal data on our website and in relation to any contract for goods or services or other commercial relationship we may have with you, or with our products and services (such as your employer) that may collect, store or otherwise process your personal data.

When you provide any information to us which may include sensitive personal data or information at our site or otherwise transmitted to us, your information stays with us and is divulged only in accordance with the applicable laws and to the authorized persons, agencies or contractors. Information collected on the website to any data-collecting agencies or external companies for marketing or solicitation purposes.

At www.hdworks.in, we want to meet your specific needs by fostering an interactive and personalized environment. Thus, we can continuously improve our relationship with you. To assure you of our commitment to privacy, we have adopted this Privacy Policy.

HDWPL and your Privacy:

This policy shall apply to all the legal entities comprising of HDWPL and its subsidiary companies and shall include such entities in the future, each of which may process your personal data basis your relationship with respective subsidiaries.

Additional information on our personal data practices may be provided in contractual agreements, supplemental privacy policies or at the time of collection of your personal data.

Our use of your personal data is governed by this Policy as it may be updated from time-to-time. The most up to date version of this Policy is available on www.a23.com and [A23.com](http://www.a23.com). Your use of our Sites or Services, and any dispute over privacy, is subject to this Policy and our Terms of Use and any written contract for Services between you and us or any person who provides you with access to our Services. Dependencies on third parties may also be applicable to you and our use of your personal data.

Sensitive Personal Data or Information (also referred to as 'Personal Information'):

HDWPL shall not collect sensitive personal data or information unless -

- the information is collected for a lawful purpose connected with a function or activity of HDWPL or any person on its behalf
- the collection of the sensitive personal data or information is considered necessary for that purpose

fraud-prevention agencies, business directories, credit check reference/vetting agencies and connected network providers. Services may also provide us with your personal data in that context.

- From publicly available sources of information
- From HDWPL's own records of how you make use of our services

How We use your Personal Information

Your personal information may be used to:

- Verify your identity
- Assist you to subscribe to HDWPL's and/or its associate's products and services
- Provide the services you require
- Administer and manage those services, including charging, billing and collecting debts
- Inform you of ways the services provided to you could be improved or of additional products, services or plans that could be offered to you
- To respond to your inquiries, to provide any information that you request, to address technical support tickets, and to provide other customer support
- Conduct appropriate checks for credit-worthiness and for fraud
- Research and develop HDWPL's and/or its associates' products and services
- To administer, monitor, improve and customize our Sites and Services, for our internal operations, including troubleshooting, quality control, product research and analytical purposes, so that we can provide our customers with a better customer experience
- Gain an understanding of your information and communication needs in order for HDWPL to provide you with a better service
- Maintain and develop HDWPL's business systems and infrastructure, including testing and upgrading of these systems. / HDWPL can promote and market its or its associates or any third party services to you (including by way of direct mail, email, etc.). If you do not wish HDWPL to promote and market its products, services, and special offers to you, please visit hdworks.in (Do Not Disturb)
- To defend any demands, claims and litigations or proceedings arising against HDWPL.
- To investigate, prevent or take action regarding illegal activities, fraud, threats to our property or personnel and violation of our policies to meet our legal and regulatory obligations.
- Carry out any activity in connection with a legal, governmental or regulatory requirement on us or in connection with legal proceedings or prosecution &
- Transfer to any other body corporate or a person in India, or located in any other country, that ensures the same level of confidentiality as this policy. If such transfer of personal information is necessary for the performance of the lawful contract between HDWPL or any person in India, or located in any other country.

Where do We disclose your Personal Information:

In order to deliver the services, you require, HDWPL may disclose your personal information, to the extent required only, to the following agencies/organizations of HDWPL. Your personal information is disclosed to these agencies/organizations only in relation to the services being provided to you through innovations:

- Subsidiaries and affiliates
- Sales and Marketing
- Business associates/business partner's/ channel partners/ agents/advertisers, who are contractually associated with us for the purpose of providing services directly or indirectly
- Third Party Service Providers
- Customer enquiries
- Mailing operations

- HDWPL's professional advisers, including its accountants, auditors and lawyers
- Government, regulatory, judicial and quasi-judicial authorities, agencies and other organizations, as required or authorized
- Organizations who manage HDWPL's business and corporate strategies, including those involved in a transfer/sale of all and trade receivables) and those involved in managing HDWPL's corporate risk and funding functions (e.g. securitization) disclose personal data in response to lawful requests by public authorities, including Security Agencies to meet national co-operation with law enforcement agencies.

Storage and Retention:

Your information or data will primarily be stored in electronic form. However, certain data can also be stored in physical form.

Your information will remain with us during your active association on account of subscription to our services and/or on our website, direct and indirect. Post your disassociation, the information will be retained by us for a minimum period of 18 months in accordance with law and/or under specific instructions from any Court, Government and Statutory Authorities.

Confidentiality of Personal Information:

We have procedures that limit employee access to your personal information to those employees only who need to have access to your information. We train all employees about the importance of confidentiality and customer privacy through standard operating procedures, training programs and other means.

All our employees are obligated to protect confidentiality and ensure security as per HDWPL Code of Conduct. Our third-party vendors also adopt and maintain reasonable level of security practices and procedures to ensure security of information received from us.

To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, we have put in place various security measures (e.g. technological and administrative measures) designed to help safeguard the personal data that we collect via the sites. No one can guarantee that personal data that we collect will never be accessed or used in an unauthorized way, which may happen due to the inherent nature of the Internet. We have put in place procedures to deal with a suspected personal data breach, and we shall notify you and any applicable regulatory authorities as soon as we are able to do so. If you have a username and password to access our services, you should take steps to protect against unauthorized access to your account, such as using a unique password, using a secure device, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and not being responsible for any lost, stolen or compromised passwords, or for any activity on your account via unauthorized passwords or accounts.

Protecting your information exchanged online:

When you apply online for our service, or provide information to us at our website, you provide personal and financial information. Information provided to us at our website is sent in a "secure session" established with Secure Socket Layer (SSL) technology that is sent over the Internet between your computer and us by encrypting it and thus prevents misuse.

Limitation of Liability:

You will appreciate and agree that no data transmission over the Internet is completely secure and for reasons outside of our control, we cannot protect any information that you make available to the general public in any publicly accessible area of our website or any other area. We do not accept liability for any breach of security, or the disclosure of Personal Information unless HDWPL has been proven to be grossly and willfully negligent.

Access, Correction and Deletion:

HDWPL takes all reasonable precautions to ensure that the personal information it collects, uses and discloses is accurate, complete and up-to-date. The accuracy of the information depends to a large extent on the information that you provide. That's why HDWPL recommends that you:

- Let HDWPL know if there are any errors in your personal information and
- Keep HDWPL up to date with changes to your personal information such as your name or address. HDWPL reserves the right to delete or amend your information if you do not provide accurate information. HDWPL reserves the right to access to your information.

You may write to HDWPL in connection with deleting or amending your information maintained and retained with HDWPL. Please contact our Privacy Officer at designated ID viz. 'info@a23.com' (Refer [Terms & Conditions](#) for further details). However, you will also agree that information deleted or is prohibited to be deleted as required under any applicable law, law enforcement requests or under any judicial order by HDWPL, as per mandates.

Changes to this Policy:

We regularly review and may make changes to this Policy from time-to-time. To ensure that you are always aware of how we use your information, we will post the current version of this Policy from time-to-time to reflect any changes to our use of your personal data. We may also make changes to this Policy to comply with regulatory requirements. Where it is practicable, we will notify you by other means prior to changes materially affecting you. However, we encourage you to review this Policy periodically to be informed of any changes to how we use your information.