

# liAS Policy and Process

## Website Privacy Policy

1/21/21

# WEBSITE PRIVACY POLICY

## PREAMBLE

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1. This IiAS Website Privacy Policy (“Policy”) has been provided to you by IiAS to familiarize you with the information that is collected through <https://www.iiasadvisory.com/> (the “Website”) and any associated applications/websites including <https://www.iiasadrian.com/> or <https://adrian.iiasadvisory.com> (IiAS’ resolution and voting data platform); <https://vms.iias.in/> (IiAS’ Voting Management System); <https://smart.iiasadvisory.com> (IiAS’ Stewardship Reporting and Management Platform); <https://iiascompayre.com> or <https://compayre.iiasadvisory.com> (platform for pay versus performance analytics) and manner in which such information is collected, used, stored, dealt with, or disclosed.
2. This Policy is being published in compliance with applicable data protection laws in India, including, *inter alia* - Section 43A of the Information Technology Act, 2000; Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011; and Rule 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011 (hereinafter, collectively referred to as “IT Law”).
3. At IiAS, your privacy is of utmost importance to us and we strive to protect the same when it comes to your dealings with us. However, we cannot ensure your privacy and you assume the risk and responsibility arising from using the Website and the internet.
4. By accessing the Website, you have confirmed that you: (a) have legal capacity to contract; (b) have read and understood this Privacy Policy and signify your assent to the Privacy Policy; and (c) have consented to IiAS collecting your information in the manner provided in this Privacy Policy.
5. This Website is not directed or intended for access by, any person or entity who is a citizen or resident of or located in any locality, state, country or other jurisdiction, where accessing this Website would be contrary to law or regulation. If this Website is being accessed outside India, you bear the sole responsibility of compliance with local laws of such jurisdiction.

## COLLECTION OF INFORMATION

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1. IiAS may collect any of the following information, depending on what product or service you use:
  - Contact information and preferences (such as name, email address, postal address, phone number, etc.)
  - Biographical and demographic information (such as date of birth, age, gender, educational and professional history, occupation details, etc.)
  - Payment-related information needed to complete a transaction (such as debit/credit card number and financial account information)
  - Username and password that you may select in connection with establishing an account on the Website or web-based applications
  - Internet activity, such as your Internet Protocol (“IP”) address
  - Device information
  - Publicly available information
  - Any information you choose to provide about yourself
2. In general, the Website may be visited without revealing information about yourself. However, you should be aware that in order to access certain features of this Website, you may be invited to voluntarily provide information about yourself as listed above, which you warrant to be

accurate.

3. We understand that the information collected from you may qualify as such information whose collection and use is governed by IT Law. We understand that the information provided to us by you is voluntary. By accessing the Website and sharing your data, you are providing us your express consent to collect, use, store, deal with or disclose your information in accordance with IT Law and the terms of this Policy. Further, in the event of any change of applicable data protection laws, you hereby expressly consent to our collecting, using, storing or disclosing the information to the extent permitted by IT Law.
4. We may use the personal information we collect about you with information obtained from other sources, such as public databases, social media platforms and other third parties for purposes as described below.
5. If you choose to submit any personal information relating to other people, you represent that you have the authority to do so and permit us to use the information in accordance with this Policy.

## PURPOSE OF COLLECTION OF INFORMATION

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1. We collect the information shared with us for the purpose of business and product development and internal operational purposes.
2. We may also use the information to:
  - Provide our products and services to you and seek feedback on them
  - Develop new products and services
  - Provide customer service
  - Send administrative communications regarding IiAS' products or services
  - Notify you about special promotions or offers that may be of interest to you
  - Invite you to participate in surveys about our products or services or in relation to other events
  - Better understand the interests of our customers and visitors who use IiAS' services
  - Conduct research including secondary and follow-on research
  - Comply with our legal and regulatory obligations
3. Using such information, we may reach out to you from time to time, on a need basis.

## DISCLOSURE OF INFORMATION

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1. We do not sell or share any personally identifiable information volunteered on this Website to any third party, unless otherwise expressly provided in this Policy.
2. We have the right to disclose any information that we have about you (including your identity) that is deemed necessary to comply with any applicable law, regulation, legal process or governmental request or in urgent circumstances, to protect public safety and the Website.
3. We also may disclose your information when we determine that the applicable law requires or permits such disclosure, including exchanging information with other companies and organizations for fraud protection purposes.

## SECURITY MEASURES

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1. IiAS will take all reasonable and appropriate steps to ensure your data is protected against unauthorized access, disclosure, destruction or alteration, but you should be aware and accept that internet transmission may not be secure and such transmission beyond our control is at your own risk.

2. IiAS shall not be responsible in case of any breach of security which is beyond our reasonable control (for example, hacking, acts of government, unauthorized access etc.)

## MISCELLANEOUS

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1. The Website may contain links to third-party websites or content. These links are provided for your information and convenience only. Mere presence of the link or its listing should not be assumed as endorsement of any kind. We have no control over the content in the linked sites or the information, data, materials, content, text, graphics, brands, logos, goods, services and webpage layout available or contained in these linked sites. Further, we do not guarantee that these links will work or be available all the time.
2. IiAS may collect information about you by using cookies, tracking pixels, web beacons and other technologies (collectively, "Tools"). We use this information to better understand, customize and improve user experience with our website and offerings. This information can make your use of our services easier and more meaningful by allowing IiAS to provide better service, customize sites based on consumer preferences, compile statistics, analyze trends and otherwise administer and improve our services. If we have collected your personal information, we may associate this personal data with information gathered through the appropriate tools. Your web browser can be set to allow you to control whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to your browser. If your browser is set to reject cookies, websites that are cookie-enabled will not recognize you when you return to the website, and some website functionality may be lost. The 'Help' section of your browser may tell you how to prevent your browser from accepting cookies.
3. You agree and undertake to keep us indemnified for any loss we incur as a consequence of your actions in relation to the Website, including your use and access of the Website and any third-party content. It is clarified that we assume no liability in relation to any consequences you may have to face as a result of your disclosure of information on the Website or to any third party.
4. We reserve the right to retain your information for business and product development purposes.
5. If you wish to provide us with your feedback, concerns or any request in relation to updating, modifying or deleting your information, you may contact us by clicking on the "Contact Us" link on the Website or by e-mailing us at [solutions@iias.in](mailto:solutions@iias.in).

## ABOUT THE POLICY

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- This policy is effective from 21 January 2021.
- This policy was last updated in June 2020.
- IiAS reserves the right to revise this policy or any part of it as and when deemed fit. Please check this page periodically for changes.