

## Privacy Policy - June 2023

### Anvaya Technologies LLC Privacy Policy

Anvaya Technologies L L C is a limited liability company incorporated in the Emirate of Dubai, United Arab Emirates, hereinafter referred to as "Anvaya".

Anvaya is an IT service & consulting company that provides a wide range of IT services. These services include infrastructure services, managed services such as infrastructure support, cloud and mobility services, software development services, product engineering services, and enterprise security & risk services. Anvaya is fully committed to ensuring the proper, open, and transparent management and use of all personal information and/or data it collects and handles complies with applicable privacy laws. This privacy policy applies only to external personal information and/or data provided by clients, Suppliers, and other external third parties that Anvaya interacts with.

This "Privacy Policy" is governed and construed in accordance with the laws of the United Arab Emirates. In case of a dispute, the parties submit to the exclusive jurisdiction of the Courts of the Emirate of Dubai. It sets out Anvaya's policy on the management of personal information and/or data that it may receive or collect.

Personal information and personal data for the purpose of this Policy is defined as "any sort of information or an opinion about an individual, whether true or not", and includes all personal data about an individual, or which can be used to identify an individual either directly or indirectly (referred to collectively as "**Personal Information**").

A sub-category of Personal Information is **sensitive information** and data. For the purposes of this Policy, sensitive information and data include information of a particularly sensitive nature, such as information relating to an individual's health, racial or ethnic origins, political opinions, membership of a trade union or political association, religious beliefs or affiliations, philosophical beliefs sexual preferences or criminal record.

#### 1. WHAT PERSONAL INFORMATION DOES ANVAYA COLLECT, FROM WHOM AND FOR WHAT PURPOSE?

Anvaya will only collect Personal Information that is necessary for its functions and activities. It will only collect Personal Information by fair and lawful means. Anvaya may collect and process personal information through a variety of mean, including, as examples, access to Anvaya sites or services. employment processes, or correspondence with Anvaya representatives, through the purchase of goods or services or in the course of online services and other marketing activities. Anvaya collects and holds different categories of information depending on the services being provided and the jurisdiction in which those services are being provided. The following types of Personal Information may be collected:

##### a) Information about Anvaya Contractors and Suppliers

Anvaya collects, directly from our contractors and suppliers, Personal Information about them. This Personal Information includes their name and contact details which allows them to be contacted. For workplace health and safety reasons, we may also collect from contractors, certain "sensitive information" with consent; for example, medical information a contractor has provided us about any injuries he or she may currently suffer. From third parties, we may also collect feedback and information relating to our contractor's and suppliers' performance of services for Anvaya. This information is collected to monitor our contractor 's and suppliers' performance of services and to ensure that we can provide the highest quality products and services to our customers.

## **b) Information about job applicants**

Applicants for a position at Anvaya will be asked to supply details relevant to the job application such as name, contact details, the information contained in CVs, driver's license, or passport. We may also collect from third parties identified as referees Personal Information relating to the applicant. This information is used to determine suitability for the vacant role.

## **c) Information about customers and their employees and customers**

Personal Information may be collected from customers such as name, contact details, bank account, and credit card details.

All personal information of the customers collected by Anvaya is used for our business functions and activities. These include:

- for billing purposes and order fulfillment;
- to contact customers about our provision of services; to maintain account details;
- to provide technical support e.g., account creation, password reset: to provide information on request about our products and services;
- to streamline and personalize customer experience while dealing with Anvaya;
- to undertake customer satisfaction surveys and to tailor Anvaya's information, services, or products to improve and enhance those services and products provided to our customers.

Anvaya may also collect from its customers Personal Information relating to its employees and customers; for example, payroll information. This Personal Information is used so that we can facilitate the provision of the services our customers have requested.

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## **2. QUALITY OF PERSONAL INFORMATION**

Anvaya will ensure, to the extent reasonably possible, that personal information collected, used, or disclosed is accurate, up-to-date, complete, and relevant. If Anvaya becomes aware that any of the personal information it holds is inaccurate, it will take prompt steps to update its records so that those records are correct.

## **3. DATA SECURITY**

Anvaya takes active measures to ensure the security of Personal Information it holds is protected from misuse, interference, loss, and unauthorized access, modification, or disclosure.

All Anvaya ICT devices, storage, and channels are subject to continuous monitoring, logging analysis, and audit. Anvaya may choose to contract a third party to perform those functions.

All Personal Information is stored at secure premises using good quality security protocols.

Anvaya security systems are regularly reviewed and updated to maintain the integrity of the Anvaya security posture.

#### **4. ACCESS AND CORRECTION OF PERSONAL INFORMATION**

Subject to verification of identity, any Personal Information held about an individual may be accessed, updated, or corrected by application to Anvaya by sending an email to [reachus@anvayatec.com](mailto:reachus@anvayatec.com) with the subject line "Privacy Policy - Anvaya."

There is generally no fee for an individual to make a request or to be provided access to his or her Personal Information. However, depending on the complexity of the request a reasonable processing fee may be charged in some cases.

Anvaya will endeavor to respond to access and correction of Personal Information within 15 business days after a written request is received by an Anvaya Officer.

#### **5. DIRECT MARKETING**

Anvaya will only engage in direct marketing practices under the laws of the relevant country or jurisdiction. At any time an individual or organization may contact Anvaya to request that they no longer receive any marketing material or information from Anvaya.

If you feel at any stage we have incorrectly used your Personal Information for direct marketing, please contact us immediately at [reachus@anvayatec.com](mailto:reachus@anvayatec.com) with the subject line "Privacy Policy - Anvaya."

#### **6. DISCLOSURE AND RETENTION OF PERSONAL INFORMATION**

As part of providing services to a customer, Anvaya may disclose Personal Information to third party suppliers and contractors of services or retain and disclose Personal Information as authorized by law for example metadata.

A formal intragroup agreement is in place to ensure all Personal Information is properly protected at all times for transfers within Anvaya.

Anvaya only retains Personal Information for as long as required by applicable law or as needed for our business functions and activities. If Personal Information is no longer needed, it is then destroyed or disposed of securely.

#### **7. INTERNATIONAL DATA TRANSFERS**

As a provider and user of IT services, including cloud services, Anvaya retains Personal Information on servers that may be located in some overseas countries.

Anvaya recognizes and respects the varying national laws and obligations and their impact on cross-border data transfers when transferring or processing Personal Information outside of the country of collection for the purposes identified above. Anvaya will take all reasonable steps to ensure that no person or entity, breaches any relevant privacy and data protection laws using a variety of lawful data transfer mechanisms and contractual agreements for privacy and data protection.

## 8. WEBSITE BROWSING

Accessing Anvaya websites will result in some information being logged including the time of access, IP address, and the pages that have been viewed or accessed.

Anvaya also stores cookies from website browsing and uses to present relevant information and for website analytics.

Anvaya websites may contain links to external websites. Anvaya is not responsible for the content or privacy policies that govern such external websites.

By visiting our website, Anvaya does not automatically capture any specific personal information from you, (like name, phone number or e-mail address), that allows us to identify you individually.

## 9. PRIVACY ISSUES

Anvaya has legal obligations under privacy legislation to hold information securely and to use it appropriately in accordance with our privacy policy. If you feel we have breached these obligations, or have any questions about this Policy, or to raise any issues about privacy or data protection within Anvaya please contact Anvaya at:

Email: [reachus@anvayatec.com](mailto:reachus@anvayatec.com) with the subject line "Privacy Policy - Anvaya."

Due to the nature of the services that Anvaya provides, in most situations, it will be impracticable for an individual to deal with us on an anonymous basis. However, Anvaya will consider anonymous requests on a case by case basis.

If you are not satisfied with Anvaya response and the issue relates to a privacy concern or alleged breach by Anvaya, you may take your complaint to the relevant government authority responsible for privacy and data protection.

**Policy first update date: June 2023**