

# **Privacy Policy**

### Introduction

New Delhi Centre For Sight Ltd. (CFS) is committed to respecting the privacy of every personal who shares information or data with CFS. Your privacy protection is important to us and we strive to take due care and protection of the information, we receive from you, the User. we adhere to the various governing laws such as:

The Information Technology Act, 2000 - Section 43A.

The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011.

This Privacy Policy ("Privacy Policy") applies to the collection, storage, processing, disclosure and transfer of your Personal Information (defined below) as per the above mentioned laws, particularly when you use the website of https://www.centreforsight.net ("Website") operated by company for any information or services ("Services").

The terms 'You' or 'Your' refer to you as the User (registered or unregistered) of the Website and/or Services and the terms 'We', 'Us" and 'Our' refer to CFS.

The Company is committed to maintaining the privacy and integrity of PSI and this privacy statement describes approach on addressing all such issues. This privacy statement provides details about the types of personal information that we collect, how we use, process, protect and disclose such personal information and the rights individuals have to control our usage and disclosure of such personal information. Personal information submitted may be transferred to other subsidiaries companies, which are part of the company network (each of which is a separate and independent legal entity), where it is necessary to meet the purpose for which the user has submitted the information. By disclosing your PSI on this website and/or submitting any PSI to us, you agree to the use and disclosure by Company of such information in accordance with this privacy statement.

# **Applicability**

This policy applies to all the offices/branches/centres of New Delhi Centre For Sight Limited including its existing subsidiaries as well as any subsidiaries that will be established/acquired by New Delhi Centre For Sight Limited in the future.

## **Data collection**

We may collect personal information from patients, employees of the Company, contractors of the Company and other persons who access this website or to whom we render services or with whom we have we have entered into contractual agreements for the sale and/or supply of goods and/or services. We collect such information for our business purposes only. "PSI" includes without limitation insurance policy details (such as your insurance carrier and insurance plan), demographic details (such as gender, date of birth and residential address), medical and health records (such as your medical history and conditions, diagnostic reports, prescriptions and medication history), contact details (name, e-mail address and phone number), or any other information that any person voluntarily chooses to provide to us. Further, we also collect information such as organizational roles of our clients, suppliers and other business contacts. Typically, this information includes without limitation, names, addresses, telephone numbers, email addresses and job titles.

Through this website, we only collect PSI that is specifically and voluntarily provided by visitors having regard to the purpose for its disclosure. It is our policy to limit the information collected to only the minimum information required to complete a visitors' request. Visitors are also able to send email through this website. Their messages will contain information such as the user's screen name and email address, as well as any additional information the user may wish to include in the message. Because we use this website as a recruiting tool, a visit to this website may also result in the user sending a resume to an employee or officer of the Company which may contain more detailed information.

## Use of personal information

The main purposes of collecting PSI are as follows:

- Providing services
- Respond to an individual's request
- Maintaining contact with patients
- Keeping patients and other contacts informed of the services we offer.
- General management and reporting purposes, such as invoicing and account management
- Recruitment of staff and providing internal services to them
- Any and all other lawful purposes related to our business and in furtherance to fulfilment of lawful contract.

PSI collected by us whether through this website or otherwise, is used only for the intended purpose stated at the time that the information is collected or for the purposes specified above. We do not collect information about the visitors of this website from other sources, such as public records or bodies, or private organisations. Due to the communications standards on the Internet, when anyone who visits this website, we automatically receive the URL of this website from which anyone visits. We also receive the Internet Protocol (IP) address of each user's computer (or the proxy server a user used to access the World Wide Web), user's computer/ device operating system and type of web browser the user is using, email patterns, as well as the name of user's ISP. This information is used to analyse overall trends to help us improve our Service. The linkage between user's IP address and user's personally identifiable information may be available to us but is not shared with other third parties. Notwithstanding the above, we may share some of the aggregate findings (not the specific data) in anonymized form (i.e., non-personally identifiable) with investors, strategic partners, and others in order to help grow our business.

This website may use cookies to store certain data (that is not sensitive personal data or information) that is used by us and our partners for the technical administration of this website, research and development, and for any user administration. In the course of serving advertisements or optimizing services to our users, we may allow authorized third parties to place or recognize a unique cookie on the user's browser. The cookies however, do not store any personal information of the user.

We and our partners shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond our reasonable control and our partners including, acts of government, computer hacking, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of Internet service or telephone service of the user etc.

### Disclosure of personal information

We do not routinely disclose or transfer an individual's personal information to other organizations unless we have the prior and specific permission of the individual or the entity that provided such information on behalf of such individuals or unless:

- such disclosure or transfer is permitted under this privacy statement or the disclosure or transfer
- $required \ by \ law, including \ for \ the \ purpose \ of \ compliance \ with \ court \ orders, \ requests \ or \ order \ from$

legal authorities or law enforcement agencies requiring such disclosure;

- we believe it necessary to provide the individual with a product or services which it has requested.
- such disclosure is required to help investigate, prevent or take action regarding unlawful and illegal

activities, suspected fraud, economic offences, potential threat to the safety or security of any person,

violations of website terms of use or to defend against legal claims; or

• the disclosure is required for us to use or process the data for the purpose for which it was obtained.

Except as set out in this privacy statement or specifically allowed under law, we will not disclose, share, sell or rent any people's personal information to any third party. If an individual wish to update or change any information, he or she may do so by requesting to us in writing at ajay.jassal@centreforsight.net and we will prospectively cease to use or modify his or her personal information.

### Personal information retention

Some of the information we receive is not retained. Contact information about visitors (such as information generated though registration for access to areas on this website) will be retained as long as the information is required for the purposes for which it was collected or until a user requests that we delete that information or as required by law. Mailing list information, discussion posts and email are kept for only the period of time considered reasonable to facilitate the visitor's requests. Information that is kept by us will be destroyed or deleted after a reasonable period from the time when it becomes outdated or is no longer required. We may, however, need to retain copies of information (which may include personal information) for internal record-keeping purposes and/or for compliance with applicable law or professional standards, whose requirements may be more than that of laws and rules requiring data protection and privacy.

We ensure that we [and our partners] implement reasonable security practices and procedures that are commensurate with respect to the information being collected and the nature of our business. The reasonable security practices and procedures implemented by us include but are not limited to encrypting data when it is on the move using industry standard practices, regularly changing production keys and password, secure access to all production servers, performing regular security updates on our servers and more.

# Security

Company has implemented generally accepted standards of technology and operational security in order to protect personal information from loss, misuse, alteration or destruction. Only authorized personnel are provided access to sensitive personal information and these personnel have agreed to maintain confidentiality, security and integrity of this information. While the Company follows the standard industry practices and takes reasonable security measures to protect the personal information under our control, information may be disclosed through any unlawful or unauthorized access or regulatory environment and measures or interception of transmissions or private communications and other users and third parties may abuse or misuse an individual's personal information. We disclaim all liability for error in transmissions and unauthorized access or interceptions, abuse or misuse by third parties and other users.

#### **Modifications**

Company reserves the right to modify or amend this statement at any time with or without notice for legal, administrative and technical reasons. These changes will become effective immediately on posting. We shall not be liable for any failure or negligence on your part to review the updated privacy policy.

#### Grievances

In case of any grievances in relation to the matters contained herein, please contact ajay.jassal@centreforsight.net or balihar.singh@centreforsight.net. We will use reasonable efforts to respond promptly to any requests, questions or concerns, which you may have regarding our use of your personal information.