



General Introduction

International Marketing Corporation Private Limited (IMC) is an Indian company incorporated under the laws of India, having its registered address at Inside Guru Nanak Dev Bhawan, Near Bharat Nagar Chowk, Ludhiana Punjab- 141008 India. IMC takes pride in respecting and protecting your privacy as much as it does in its products and satisfied customers. Thus, the present document discloses every aspect of your privacy while you use the services provided by us through our website. In this policy, any reference to "Our", "We" and "Us" refer to IMC.

This Privacy Policy describes what all information we collect, how we use it, what information we share and your rights/ choices regarding our use and disclosure of your personal information. It also details the safety measure employed by us to secure your information and where to reach us if you have any query or complaint regarding the present policy and our practices.

Definitions

For the purpose of this Privacy Policy, the terms will carry the same meaning as defined herein below. Terms which are not defined herein but are defined elsewhere in our literature will have that assigned meaning if the context allows so. Further, the words not defined herein or elsewhere will have their dictionary meaning. Now, the terms are defined as below:

- "Account" means a unique account created by You to access our Services or parts of our Services.
- "Automated" means any equipment capable of operating automatically in response to instructions given for the purpose of processing data.
- "Child" means a person who has not attained the age of majority under the applicable laws.
- "Company" (referred to as either "the Company", "We", "Us" or "Our" in this Policy) refers to IMC, International Marketing Company Private Limited having CIN U15490PB2013PTC038243 and registered address at Inside Guru Nanak Dev Bhawan, Near Bharat Nagar Chowk, Ludhiana Punjab- 141008 India.
- "Cookies" are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses. For more information on cookies, kindly visit: www.allaboutcookies.org
- "Country" refers to the territory of India.
- "Data Fiduciary" means any person, including the State, a company, any juristic entity or any individual who alone or in conjunction with others determines the purpose and means of processing of personal data

- "Data Principal" means the natural person to whom the personal data relates
- "Data Processor" means any person, including the State, a company, any juristic entity or any individual, who processes personal data on behalf of a data fiduciary;
- "Device" means any device that can access the Service such as a computer, a cell phone or a digital tablet.
- "Personal Data" means data about or relating to a natural person who is directly or indirectly identifiable, having regard to any characteristic, trait, attribute or any other feature of the identity of such natural person, whether online or offline, or any combination of such features with any other information, and shall include any inference drawn from such data for the purpose of profiling
- "Processing" in relation to personal data, means an operation or set of operations performed on personal data, and may include operations such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, use, alignment or combination, indexing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction
- "Service Provider" means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- "Service" refers to the Website and e-shop and other facilities and services provided by us via electronic sources including Internet.
- "Third-party Social Media Service" refers to any website or any social network website through which a User can log in or create an account to use the Service.
- "Usage Data" refers to data collected automatically, either generated using the Service or from the Service

infrastructure itself (for example, the duration of a page visit).

- "Website" refers to our website accessible at <https://www.imcbusiness.com/>
- "You" means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Data Fiduciary

We, IMC, are data fiduciary under the present policy. As we collect and use your personal data and are responsible for protecting your rights with respect to your Personal Data as per the applicable Personal Data Protection Law.

For certain Data Processing, we hire third party service providers and as such these third-party service providers act as data processors. As such, these third-party service providers are bound by the present Privacy Policy, but we shall not be held responsible and/or liable for any breaches thereof.

Collection of Information

We collect information so to serve you better and provide you with a more personalised experience every time you associate with us. The information collected differ as per your use of our services, for instance if you are merely browsing the site or you are creating an account or you are registered as a Business Associate or Preferred Customer etc. We collect your data in number of ways and the same is processed as per the legal framework as per the applicable statute/s (with or without your consent).

We may collect the following information among others:

- Contact information such as name, address, contact details including telephone number, email id, birth date, Usage Data, Cookies etc.
- If you are creating an account then we maintain record of all the information requested from you including the documents uploaded by you.
- In case of a payment made on our site for purchase of our products or services, we don't keep your financial data as we use third-party industry leaders to process our payments and as such, we don't record any data other than the transaction details for our records.
- We also obtain your shopping history, orders placed, account number, browsing history on our website.
- We at our discretion may record any calls made to us irrespective of them being complaints/ query/ feedback/ appreciation etc. All such data may be used to solve the query, implement your suggestions, to contact you or to predict market trends, strategies etc. all such conversation may also be recorded for the purpose of providing quality and training to our teams.
- We may publish our promotional offers, surveys, contests etc. wherever it is legally permitted to be hold, and in any such event we may ask for any information as depicted in any such event and your entry in to any such event is your consent to us to process the data provided to us for our business activities.
- Subscribers to our promotional offers and others via electronic delivery.
- Any content / information submitted to us. by you

In addition to the above-mentioned information, we might as well consult marketing or demographic third-party firms to gather personal information to improve our services and marketing efforts.

Usage Data

It is data which is automatically collected while you interact with or usage of our website and services offered therein. The data may include the accessing device Internet Protocol Address (I.P. address), browser type, specific pages/ products/ services visited, duration of such visits, Device Ids, and other unique identifiers etc. Additionally, we may also store information sent by your browser.

This information is mostly automated with the help of cookies, web server log and other similar technologies. A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's web browser or to store information or settings in the browser. A "web beacon," also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server.

The information we obtain in this manner may include your device IP address, other identifiers associated with your devices, web browser characteristics, device characteristics, language preferences, referring/exit pages, clickstream data, and dates and times of Site visits. These technologies help us (1) remember your information so you will not have to re-enter it; (2) track and understand how you use and interact with our products, services and Sites; (3) tailor our products, services and Sites around your preferences; (4) measure the usability of our products, services and Sites

and the effectiveness of our communications; and (5) otherwise manage and enhance our products, services and Sites. Your web browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of our Sites. For mobile devices, you can manage how your device and browser share certain device data by adjusting the privacy and security settings on your mobile device. To the extent required by applicable law, we will obtain your consent before using cookies or similar tools.

Why We Collect Your Information?

We may process your personal information for purposes necessary for the performance of a contract with you, for example for the processing or fulfilment of the provision of its services, and to comply with its legal obligations.

We may process your personal information for the purposes of its own legitimate interests. This includes processing for business creation, development, management, and statistical and research purposes, which will include analysis and tracking of transactions. You have the right to object to this processing where we rely on a legitimate interest.

We may process your personal information for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal information then we will obtain your separate consent at that time and you will also have the right to withdraw your consent to processing for these specific purposes (see 'Right to Withdraw Consent' section below).

Please note that we may process your personal information for more than one lawful ground depending on the specific purpose for which it is using your data.

All personal information collected is processed in compliance with relevant Data Protection Legislation.

Purpose and Lawful Basis for Processing

When processing your personal information, the purposes for which and the lawful bases upon which your personal information is processed include the following, to the extent that they apply to you:

- to perform customer services to fulfil our contractual obligations toward you, and on the basis of its legitimate interests, or your legitimate interests, to provide the best customer service we can;
- to support our business processes including information technology, electronic communications and electronic documents storage, management and transmissions, to fulfil its contractual obligations toward you, or, if not applicable, on the basis of its legitimate interests to provide the best customer service it can, to support its business operations, administration, IT services, and network security, and to prevent fraud;
- to safeguard your personal information and our IT system with appropriate security, on the basis of your and our legitimate interest in such security;
- to exchange information, conduct due diligence, and answer your initial questions, to take steps required to enter into a contract with you, or for the purposes of our legitimate interests, to protect our legal rights and a third party's rights, or, if not applicable, on the basis of your consent;
- to keep you up-to-date with news that may be of interest to you, on the basis of your consent;
- to present our websites and online content in the best possible way for you and on your computer, on the basis of its legitimate interests to keep its websites updated and relevant, to develop our outreach and business operations, and to develop marketing strategy;
- for business transactions such as a merger, acquisition by another company, or sale of all or a portion of our assets on the basis of our legitimate interests to sell or expand our business operations; and/or
- to comply with legal and regulatory requirements applicable to us.

Where the processing of your personal information is based on your consent only, you have the right to withdraw this consent at any time. We will then erase your personal information or otherwise put it beyond use and will stop processing it or make the same anonymise and continue processing the same without your consent.

If you fail to provide certain information when requested, we may be unable to perform a contract entered into with

you or may be prevented from complying with our legal obligations and for such we cannot be held liable. We will only use your personal information for the purposes for which it collected it, pursuant to this Privacy Notice, unless it reasonably considers it needs to use it for another reason, and the reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you, and will explain the legal basis which allows it to do so.

Marketing

You may receive marketing communications from us, if you have given your consent, and where you have not opted out of receiving marketing communications. You can ask us to stop sending you marketing messages at any time by following the unsubscribe links on any marketing message sent to you or by emailing Support.eshop@imcbusiness.co.in at any time. However, by doing so you will miss out on all amazing offers and our new products.

Retention of Your Information?

We only keep your personal data for as long as we need it for the purpose for which we hold your personal data to meet your needs and three years thereafter as required under law of limitation. To determine the appropriate data retention period of your data, We will consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which your personal information is processed, whether those purposes can be achieved through other means, and the applicable legal requirements. The following provides the extent of retention subject to other use by us as deemed necessary:

- a) Where you purchase products and services, we keep your personal data for the duration of our contractual relationship;
- b) Where you contact us for an enquiry, we keep your personal data for the duration needed for the processing of your enquiry;
- c) Where you create an account, we keep your personal data until you require us to delete it.
- d) Where you have consented to direct marketing, we keep your personal data until you unsubscribe
- e) Where cookies are placed on your computer, we keep them for as long as necessary to achieve their purposes (e.g., for the duration of a session for shopping cart cookies or session ID cookies) and for a period defined in accordance with local regulations and guidance.

We may retain some personal data to comply with our legal or regulatory obligations, as well as to allow us to manage our rights (for example to assert our claims in courts) or for statistical or historical purposes. When we no longer need to use your personal data, it is removed from our systems and records or anonymized so that you can no longer be identified from it.

Distribution & Disclosure of Your Personal Information

To provide its products and services and effectively run its business, we need to transfer and share your personal information. Transfer and sharing of personal information may occur only with your explicit consent which you hereby grant by your continued usage of the website and its services.

Categories of recipients

Your personal information may be transferred to any of the following categories of recipients:

- Third party service providers;
- other vendors, suppliers or other third parties used by Us in connection with the provision of its products and services including administrative, payment processing, IT, marketing, printing, shipping, fulfilment, web tools, fraud prevention, services as required to obtain the services needed to operate its business or to provide products and services to customers;
- Franchise;
- Third-party analytics services
- professional advisers including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services and
- public authorities if required to do so by law or legal process, in response to a request from government authorities, or if we believe that disclosure is necessary to prevent personal harm or financial loss.

All third-party service providers are required to take appropriate security measures to protect your personal information and are not allowed to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with its instructions.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

We reserve the right to transfer your personal information in the event of a sale or transfer of all or a portion of its business or assets. Should such a sale or transfer occur, the transferee will be required to use your personal information in a manner consistent with this Privacy Notice and the applicable legal framework.

Other Online Services and Third-Party Features

The Sites may provide links to other online services for your convenience and information, and may include third-party features such as apps, tools, payment services, widgets and plug-ins (e.g., Facebook, Twitter, Instagram, YouTube and Pinterest buttons). These online services and third-party features may operate independently from us. The privacy practices of the relevant third parties, including details on the information they may collect about you, is subject to the privacy statements of these parties, which we strongly suggest you review. To the extent any linked online services or third-party features are not owned or controlled by us, and thus, we are not responsible for these third parties' information practices.

Data Security

We place great importance on the security of all personal information of our customers and other data subjects. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered, or disclosed.

In addition, access to your personal information is limited by Us to those persons who have a business to need to know. They will only process your personal information under our instructions, and they are subject to a duty of confidentiality.

We have in place procedures to deal with any suspected data security breach and will notify you and the Data Protection Officer of India in the event of a suspected breach where it is legally required to do so.

Thus, the importance of securing Your Personal Data cannot be reiterated but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, we cannot guarantee its absolute security.

Your Rights Under This Policy

Depending on the facts and circumstances related to the personal information collected or obtained about you – including, for example, the nature of the information processed or where you are located or reside – you may have rights regarding the personal information held about you under relevant Data Protection Legislation. These may include the right to request information about, or access to, the personal information held, and rights to complain about how your personal information is handled. We are committed to honouring your legal rights whilst ensuring that such rights are exercised in accordance with our legal and ethical obligations. As such, we offer certain rights as following to you in connection with your personal information limited to our own legal rights and obligations:

Right to confirmation and access

You may confirmation from the data fiduciary whether the data is processing or has been processed and request whether We holds personal information about you and request a record or a description of your personal information including information about the identity of all third parties, or categories of third parties, who have, or have had access to the information under the relevant Personal Data Protection Bill.

Right to correction and deletion

You may request the correction or deletion of your personal information where it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully You may also request the destruction or deletion of a record of personal information that We are no longer authorised to retain.

Right to objection

You have a right to object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

For more information on the full extent of your rights please contact We by mail or e-mail at the addresses indicated

herein with a brief explanation of your request.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose – for example, in relation to direct marketing you have indicated you would like to receive from Us – you have the right to withdraw your consent for that specific processing.

You can exercise this option at any time by contacting Us either by post or email. Once We have received notification that you have withdrawn your consent, We will no longer process your information for the purpose or purposes you originally agreed to, unless We have another legitimate basis for doing so in law.

If you would like to unsubscribe from any electronic marketing communication you can also click on the 'unsubscribe' button at the bottom of the relevant communication. It may take up to 10 days for this to take place.

Right to receive data in a structured manner

You have the right to obtain your data in structured, commonly used and computer readable form when the data is processed via automated means.

Right to complain

We strive to resolve any query or concern you raise about Our use of your personal information. However, if you believe that your personal information is not being lawfully processed by Us under applicable Data Protection Legislation, you may lodge a complaint with the Data Protection Officer of India, using the contact details listed below:

For mailing address is as follow: - Support.eshop@imcbusiness.co.in

For contacting us over mail, kindly mail us to at: - **International Marketing Corporation Pvt. Ltd.**

Regd. Office: IMC Bhawan, Inside Guru Nanak Dev Bhawan,

Near Bharat Nagar Chowk, Ludhiana-141001

You can also use the contact information as mentioned above to send your feedback, queries and suggestions in relation to this Privacy Policy.

Children's Personal Information

The Sites are designed for a general audience service and are not directed to children. We do not knowingly collect or solicit personally identifiable information from children under the age of 18 or the age of maturity as per the applicable law. If we learn that we have collected personal information from a child under age 18, we will promptly delete that information. If you believe that a child under age 18 may have provided us with personal information, please contact us at Support.eshop@imcbusiness.co.in

Amendments

We reserve the right to update/ modify/ substitute/ repeal at any time and without any prior notice, where legally permissible. Howsoever, if we make any material change to this Privacy Policy, we will notify the same on our website. However, you are requested to regularly check on our privacy policy for your knowledge and rights under the same.

