

## **Protecting your personal details on our website.**

BEE INTERNATIONAL CONSULTANCY PRIVATE LIMITED, whose registered office is at Registered office: G - 117, IInd Floor, Street B, 3Rd Cross Road, Panampilly Nagar, Kochi, India 682036, knows that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This notice describes our privacy policy and forms part of our website terms and conditions ('Website Terms').

By accepting our Website Terms or by visiting [www.techbank.finance](http://www.techbank.finance) ('the Website') you are accepting and consenting to the practices described in this Privacy Policy.

The Website is brought to you by BEE INTERNATIONAL CONSULTANCY PRIVATE LIMITED. BEE INTERNATIONAL CONSULTANCY PRIVATE LIMITED believes it is important to protect your Personal Data (as defined in the Data Protection Act 1998) and we are committed to giving you a personalised service that meets your needs in a way that also protects your privacy. This policy explains how we may collect Personal Data about you. It also explains some of the security measures we take to protect your Personal Data, and tells you certain things we will do and not do. You should read this policy in conjunction with the Website Terms.

In the event that we require you to provide personal data, such as when you complete our enquiry form(s) or register as a member, this information will only be used to contact you in relation to the services you have requested or such other services that, in view of the information you provide to us, we feel may be of benefit to you. Any personal data will be held securely on our servers, and we promise never to sell your data.

In any event, all handling or processing of any data, personal or anonymous, will be in strict compliance with the Data Protection laws including GDPR.

When we first obtain Personal Data from you, or when you take a new service or product from us, we will give you the opportunity to tell us if you do or do not want to receive information from us about other services or products (as applicable). You can normally do this by ticking a box on an application form or contract. You may change your mind at any time by emailing us at the address below.

Some of the Personal Data we hold about you may be 'sensitive personal data' within the meaning of the Data Protection Act 1998, for example, information about your health or ethnic origin.

### **1. Collecting Information**

We may collect Personal Data about you from a number of sources, including the following:

1. From you when you agree to take a service or product from us, in which case this may include your contact details, date of birth, how you will pay for the product or service and your bank details.
2. From you when you contact us with an enquiry or in response to a communication from us, in which case, this may tell us something about how you use our services.
3. From documents that are available to the public, such as the electoral register.

## 2. Using Your Personal Information

1. Personal Data about our customers is an important part of our business and we shall only use your Personal Data for the following purposes and shall not keep such Personal Data longer than is necessary to fulfil these purposes:

1. To help us to identify you when you contact us.
2. To help us to identify accounts, services and/or products which you could have from us or selected partners from time to time. We may do this by automatic means using a scoring system, which uses the Personal Data you

have provided and/or any information we hold about you and Personal Data from third party agencies (including credit reference agencies).

3. To help us to administer and to contact you about improved administration of any accounts, services and products we have provided before, do provide now or will or may provide in the future.
4. To allow us to carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical and testing information.
5. To help to prevent and detect fraud or loss.
6. To allow us to contact you in any way (including mail, email, telephone, visit, text or multimedia messages) about products and services offered by us and selected partners unless you have previously asked us not to do so.
7. To keep you up to date with our member benefit scheme under which, as part of your membership benefits, we will give you membership information and details of discounts and offers we negotiate

from time to time on behalf of our members. If you do not wish to receive this benefit, please write to our Data Protection Manager at the address given in clause 7.1 below.

8. We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.
  9. We may check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we will record this.
2. We will not disclose your Personal Data to any third party except in accordance with this Privacy Policy.
  3. We may allow other people and organisations to use Personal Data we hold about you in the following circumstances:
    1. If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case Personal Data held by us, about our customers, will be one of the transferred assets.
    2. If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.
    3. We employ companies and individuals to perform functions on our behalf and we may disclose your Personal Data to these parties for the purposes set out in clause 2.1 or, for example, for fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit and debit card payments and providing customer service. Those parties are bound by strict contractual provisions with us and only have access to Personal Data needed to perform their functions, and may not use it for other purposes. Further, they must process the Personal Data in accordance with this Privacy Policy and as permitted by the Data Protection Act 1998. From time to time, these other people and organisations to whom we may pass your Personal Data may be outside the European Economic Area. We will take all steps reasonably necessary to ensure that your Personal

Data is treated securely and in accordance with this Privacy Policy and the Data Protection Act 1998.

4. Where you give us Personal Data on behalf of someone else, you confirm that you have provided them with the information set out in this Privacy Policy and that they have not objected to such use of their Personal Data.
5. In connection with any transaction which we enter into with you:
  1. We, and other companies in our group, may carry out credit and fraud prevention checks with one or more licensed credit reference and fraud prevention agencies. We and they may keep a record of the search. Information held about you by these agencies may be linked to records relating to other people living at the same address with whom you are financially linked. These records will also be taken into account in credit and fraud prevention checks. Information from your application and payment details of your account will be recorded with one or more of these agencies and may be shared with other organisations to help make credit and insurance decisions about you and members of your household with whom you are financially linked and for debt collection and fraud prevention. This includes those who have moved house and who have missed payments.
  2. If you provide false or inaccurate information to us and we suspect fraud, we will record this and may share it with other people and organisations. We, and other credit and insurance organisations, may also use technology to detect and prevent fraud.
  3. If you need details of those credit agencies and fraud prevention agencies from which we obtain and with which we record information about you, please write to our Data Protection Manager at BEE INTERNATIONAL CONSULTANCY PRIVATE LIMITED India.

### **3. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA**

In this Section 3, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA). We and our other group companies have offices in India, USA and Singapore. To facilitate our operations we may transfer, store, and process your information within those countries or with service providers based in Europe,

India, Asia Pacific and North America. Laws in these countries may differ from the laws applicable to your Country of Residence. For example, information collected within the EEA may be transferred, stored, and processed outside of the EEA for the purposes described in this Privacy Policy. Where we transfer store and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection.

#### 4. **.YOUR RIGHTS WITH REGARD TO PERSONAL DATA**

In this Section 4, we have summarized the rights that you have under data protection law based on whether you are a EEA resident (a **EEA Resident**) or you are not a resident of the EEA (a **Non- EEA Resident**). Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

1. Non-EEA Residents. If you are a Non- EEA Resident, you may access and verify your Personal Information held by BICPL by submitting a written request to us at <https://techbank.finance>.
2. EEA Residents. If you are a EEA Resident, your principal rights under data protection law are:
  - (a)the right to access;
  - (b)the right to rectification;
  - (c)the right to erasure;
  - (d)the right to restrict processing;
  - (e)the right to object to processing;
  - (f)the right to data portability;
  - (g)the right to complain to a supervisory authority;and
  - (h)the right to withdraw consent.
3. As a EEA Resident, you have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data.

Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by writing to us at [support@techbank.finance](mailto:support@techbank.finance)

4. As a EEA Resident, you have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. You can request correction or modification of your personal data by writing to us at : [support@techbank.finance](mailto:support@techbank.finance)
5. In some circumstances, as a EEA Resident, you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims. You can request the deletion of your account by writing to us at : [support@techbank.finance](mailto:support@techbank.finance).
6. In some circumstances, as a EEA Resident, you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or

defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest

7. As a EEA Resident, you have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
8. As a EEA Resident, you have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
9. As a EEA Resident, you have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
10. To the extent that the legal basis for our processing of your personal data is:
  - (a) consent; or
  - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, and you are a EEA Resident, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others. You can request to download your

account information, by writing to us at : [support@techbank.finance](mailto:support@techbank.finance)

11. To the extent that the legal basis for our processing of your personal data is consent and you are a EEA Resident, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
12. You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 4.
13. Transfers to our affiliated entities, to our service providers and other third parties will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission or applicable certification schemes.

## **5. RETAINING AND DELETING PERSONAL DATA**

1. This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
3. We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your information to provide the Services to you, you can request that we erase your personal information and close your account.
4. Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Protecting Information**

We have strict security measures to protect Personal Data.

1. We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.
2. We reveal only the last five digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing.
3. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
4. It is important for you to protect against unauthorised access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

### **7. The internet**

1. If you communicate with us using the internet, we may occasionally email you about our services and products. When you first give us Personal Data through the Website, we will normally give you the opportunity to say whether you would prefer us not to contact you by email. You can also always send us an email (at the address set out below) at any time if you change your mind.
2. Please remember that communications over the internet, such as emails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered - this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of Personal Data that is beyond our control.

### **8. Cookies**

When we provide services, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information on your computer. These are called 'cookies'.

These cookies cannot be used to identify you personally and are used to improve services for you, for example through:

- Letting you navigate between pages efficiently
- Enabling a service to recognise your computer so you don't have to give the same information during one task
- Recognising that you have already given a username and password so you don't need to enter it for every web page requested
- Measuring how many people are using services, so they can be made easier to use and that there is enough capacity to ensure they are fast

See [allaboutcookies.org](http://allaboutcookies.org) or [www.youronlinechoices.eu](http://www.youronlinechoices.eu) to learn more about cookies.

Visit [www.google.co.uk/goodtoknow/data-on-the-web/cookies](http://www.google.co.uk/goodtoknow/data-on-the-web/cookies) for a video about cookies.

Users typically have the opportunity to set their browser to accept all or some cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these options, of course, means that personalised services cannot be provided and the user may not be able to take full advantage of all of a website's features. Refer to your browser's Help section for specific guidance on how it allows you to manage cookies and how you may delete cookies you wish to remove from your computer.

Multiple cookies may be found in a single file depending on which browser you use.

The cookies used on this website have been categorised based on the categories found in the ICC UK Cookie guide, as follows:

#### Category 4: targeting cookies or advertising cookies

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

The list below shows the cookies that we use, other than those that are strictly necessary to this service. If you have any queries about these, or would like more information, please

contact our Data Protection Manager at BEE INTERNATIONAL CONSULTANCY PRIVATE LIMITED India, or email us at support@techbank.finance.

<b>Cookie name</b>	<b>Description</b>
Session Cookies	These cookies will expire once your web browser is closed. These cookies are used for various reasons such as remembering what items have been added to a shopping basket.
Persistent Cookies	These cookies are still stored on your computer after you have closed your web browser which allows your preferences on websites to be remembered. These cookies are used for a variety of purposes, for example, remembering your preferences on a website (your language choice or your user name on a particular website).
Third Party Cookies	We use a third party, who researches the use of our website and activities on it on our behalf. In order for them to do this they will store cookies on your computer that does not contain any personal information for others to read and understand. These third party cookies are grouped as 'Analytics & Optimisation' that is outlined below.
Analytics & Optimisation	Web analytics platform and a multi-variant testing platform to monitor and optimise this website, both of which utilise Cookies to capture anonymous data about a user's journey and aggregate this data up to analyse trends. These Cookies last longer than the user's session so that we can understand whether this is a user's first time, or a returning visitor. The Orderbook website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics also uses cookies so that BEE INTERNATIONAL CONSULTANCY PRIVATE LIMITED can analyse how users use the website. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information

Cookie name	Description
	<p>for the purpose of evaluating your use of the website, compiling reports on website activity for BEE INTERNATIONAL CONSULTANCY PRIVATE LIMITED and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you will be unable to collect BEE INTERNATIONAL CONSULTANCY PRIVATE LIMITED Points on online purchases if you do. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.</p>

By using this website, you agree that we can place these types of cookies on your device.

## 9. Links

1. The Website may include third-party advertising and links to other websites. We do not provide any personally identifiable customer Personal Data to these advertisers or third-party websites.
2. These third-party websites and advertisers, or internet advertising companies working on their behalf, sometimes use technology to send (or 'serve') the advertisements that appear on the Website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices. In addition, the Network Advertising Initiative offers useful information about internet advertising companies (also called 'ad networks' or 'network

advertisers'), including information about how to opt-out of their information collection.

3. We exclude all liability for loss that you may incur when using these third party websites.

10. Further Information

1. If you would like any more information or you have any comments about our Privacy Policy, please either write to us at Data Protection Manager, BEE INTERNATIONAL CONSULTANCY PRIVATE LIMITED , or email us at support@techbank.finance.
2. We may amend this Privacy Policy from time to time without notice to you, in which case, we will publish the amended version on the Website. You confirm that we shall not be liable to you or any third party for any change to this Privacy Policy from time to time. It is your responsibility to check regularly to determine whether this Privacy Policy has changed.
3. You can ask us for a copy of this Privacy Policy and of any amended Privacy Policy by writing to the above address or by emailing us at support@techbank.finance. This Privacy Policy applies to Personal Data we hold about individuals. It does not apply to information we hold about companies and other organisations.
4. If you would like access to the Personal Data that we hold about you, you can do this by emailing us at support@techbank.finance or writing to us at the address noted above. There may be a nominal charge of £10 to cover administrative costs.
5. We aim to keep the Personal Data we hold about you accurate and up to date. If you tell us that we are holding any inaccurate Personal Data about you, we will delete it or correct it promptly. Please email us at support@techbank.finance or write to us at the address above to update your Personal Data.