

Obtaining Consent and Issuing Notices Standard

Name Of Standard:	Number:
Obtaining Consent and Issuing Notices Standard	
Domain: Privacy	Category:
Date Issued:	Issued By Direction Of:
Date Revised:	

Abstract:

The purpose of this guideline is to describe (Company Name) obtaining consent and issuing notices as per requirements. Consent is fundamental to the participation of individuals in the decision-making process for the collection and use of their Personal Data and the use of technologies that may increase risk to personal privacy.

(Company Name) must collect consent from individuals prior to collecting and storing their Personal Data. To obtain consent, (Company Name) must provide individuals with appropriate notice of the purposes of the Personal Data collection or technology used and a means for individuals to consent to the activity.

All departments are expected to meet the legal and contractual requirements for obtaining consent and issuing notices to individuals before collecting and storing their information.

General:

Internal guidelines for obtaining consent and issuing Notices apply to all the departments collecting individuals' Personal Data. The requirements outlined in this document are the guidelines for the department's Data Protection Officer (DPO) or the IT/Information Security Head and (Company Name) employees designated to receive informed consent and issuing notices to the individuals prior to collecting and storing Personal Data.

Standard:**Process for Issuing Notice**

- (Company Name) provides individuals with appropriate notice for the purposes of the Personal Data collection and a means for individuals to consent to the activity. Policies prohibit the use of data for anything other than the use that was disclosed prior to collection, and therefore does not have a requirement to re-obtain consent.
- Policy statements indicate that data may only be used for the expressed purpose that was disclosed at the time of collection.
- If an additional use of data is subsequently identified, previously collected data is not used; rather notice of this additional required use is first provided, and the necessary data is then collected for this additional use.
- In the event an exception to this policy were required and approved, (Company Name) would, as appropriate, provide written and/or electronic notice of the change; and request consent for the change in data collection, use, sharing and/or disclosure practices.
- Before a major system change occurs, the use of Personal Data is evaluated to determine if the use of the data is for anything other than the use disclosed prior to collection.
- If the use of data is found to have expanded, the system will be subjected to the same development process uses.

Process for obtaining Consent

- (Company Name)'s rights and responsibilities webpage establishes how Personal Data will be used after consent is given. It explains the various benefits programs for which the Personal Data will be collected.
- Designated (Company Name) employees collect consent from individuals prior to collecting, storing and releasing their Personal Data.
- The applicants sign a paper or electronic form to authorize (Company Name) for collecting the Personal Data.
- (Company Name) obtains consent where feasible and appropriate, from individuals before any new uses or disclosures of previously collected Personal Data.
- (Company Name) clearly establishes the consequences of violating any part of the rights and responsibilities agreement. (Company Name) has listed the negative consequences of providing inaccurate Personal Data under the prohibitions and penalties section on rights and responsibilities Webpage.
- The DPO or the IT/Information Security Head is responsible for implementing this control.

Obtaining Consent through supported communication channel

(Company Name) obtains consent through below listed communication channels:

- Online (i.e. Web)
- Phone (i.e. Voice)
- Paper
- In person (i.e. Assistor/office)
- Other (Specify, e.g. Mobile App)

Online (i.e., Web)

AE Interaction	How Handled
How is individuals' consent obtained and/or rescinded?	<ul style="list-style-type: none"> • Prior to the application submission by individuals there are signature options to either e-Sign or to print, sign, and mail the signature page. • Individuals are required to review information on 'Rights & Responsibilities' page and have to accept the rights and responsibilities to proceed further for submission of the application. • (Company Name) receives the consent from individuals when they submit the application for benefits or health insurance enrollment through the (Company Name) applications.

Phone (i.e., Voice)

AE Interaction	How Handled
How is individuals' consent obtained and/or rescinded?	<ul style="list-style-type: none"> • Individuals can opt out of the collection or use of their Personal Data by calling the (Company Name) HELPLINE at <insert HELPLINE number> and request to opt out by raising a ticket in the system or by giving verbal consent by contacting either their case worker or health care provider.

Paper

AE Interaction	How Handled
How is individuals' consent obtained and/or rescinded?	<ul style="list-style-type: none"> • Prior to the application submission by individuals there are signature options to either e-Sign or to print, sign, and mail the signature page. Individuals are required to review information on 'Rights & Responsibilities' page and have to accept the rights and responsibilities to proceed further for submission of the application. • (Company Name) receives the consent from individuals when they submit the application for benefits or health insurance enrollment through the (Company Name) applications. • Individuals can opt out of the collection or use of their Personal Data, or rescind consent anytime by writing a letter to the (Company Name) to opt out.

In Person (i.e., Assister and/or Office)

AE Interaction	How Handled
How is individuals' consent obtained and/or rescinded?	<ul style="list-style-type: none"> (Company Name) obtains signed consent from individuals.

Other (Specify, e.g., Mobile App)

AE Interaction	How Handled
How is individuals' consent obtained and/or rescinded?	<ul style="list-style-type: none"> Prior to the application submission by individuals there are signature options to either e-Sign or to print, sign, and mail the signature page. Individuals are required to review information on 'Rights & Responsibilities' page and have to accept the rights and responsibilities to proceed further for submission of the application. (Company Name) receives the consent from individuals when they submit the application for benefits or health insurance enrollment through the (Company Name) applications.

Exemptions from this Standard:

Exemptions from this Standard: System owners unable to comply with this guideline must discuss any exemption request with the DPO.

Refresh Schedule:

All standards and referenced documentation identified in this standard will be subject to review and possible revision annually or upon request by the (Company Name) Information Technology Team.

Standard Revision Log:

Change Date	Version	Change Description	Author and Organization
	1.0	Draft	(Company Name)

AVTEC LIMITED ONLINE PRIVACY POLICY

URL: _____

This document is intended solely for the information and internal use of AVTEC Limited and is not intended to be and should not be used by any other person or entity. No other person or entity is entitled to rely, in any manner, or for any purpose, on this document.

This Privacy Policy explains how AVTEC Limited and certain affiliates ("we," "us," "our," AVTEC Limited collect, use, share, and protect information in connection with (AVTEC Limited) services that refer or link to this Privacy Policy ("our Services"). This Privacy Policy applies regardless of the type of device you use to access our Services.

AVTEC Limited reserves the right to change this Privacy Policy at any time by posting the updated Policy here along with the date on which the Policy was changed. If we make material changes to this Privacy Policy that affect the way we collect, use and/or share your personal information, we will notify you by including a "NEWLY UPDATED" label with the "PRIVACY POLICY" link on our Services for 30 days after material changes are made.

Information we collect and how we collect it

We collect and maintain personal information about you from many sources to understand and meet your needs, customer/vendor appointment or employment, manage our business, and for other purposes disclosed to you. For example, we collect personal information about you from:

- You, when you voluntarily provide us with information
- Your transactions with AVTEC Limited
- Other third-party sources
- Cookies

If the information is to be collected directly from you, you may in some cases have the option to decline providing that information. However, your choice to not provide information may impact your use of certain features or services.

The personal information we collect about you through these various sources may include, but is not limited to:

- Name, addresses and telephone numbers
- Date of birth and gender
- Email addresses, fax numbers and pager numbers

- Account number
- Credit/debit card number(s), including associated billing address(es) and expiration date(s)
- Information required to facilitate travel or other services, including travel companion(s) names, emergency contacts, and photographs
- Passport number, nationality and country of residence
- Information provided via survey, focus group or other marketing research efforts

Corporate-contract, employer and/or other corporate affiliation (e.g., employer name, title, work address and contact information), including Business Extra account information (e.g., tax ID, business type, number of employees) To the extent that the personal information we collect constitutes sensitive personal information under applicable law, AVTEC Limited will collect and process this sensitive personal information within the limits provided by applicable law, and only after establishing reasonable security safeguards for such sensitive personal information. Where required by law, AVTEC Limited will seek your consent before processing sensitive personal information.

Minors

AVTEC Limited does not knowingly collect personal information directly from children—persons under the age of 16, or another age if required by applicable law—other than when required to comply with the law or for safety and security reasons.

If you are a parent or guardian of a child who has provided personal information without your knowledge and consent, you may request we remove this children's information by emailing corporate@avtec.in.

Automatically collected information (including cookies and geolocation)

When you use our Services, we may receive technical information such as your browser type, the type of operating system you use, your geolocation, the name of your internet service provider, mobile advertising identifiers, and pages visited on our Services. AVTEC Limited gets this information by using technologies, including cookies, web beacons, and mobile device geolocation to provide and improve our Services and advertising, including across browsers and devices (also known as cross-device linking). We also use this information to verify that visitors meet the criteria required to process their requests and for reporting activity on our Services. For example, we may want to know how long the average user spends on our Services or which pages or features get the most attention. This automatically collected information may be combined with information that is personally identifiable in order to personalize our Services and advertising to your interests, including across browsers and devices.

Additionally, AVTEC Limited may combine the information we receive from you with information collected from other sources. This information may be used to provide offers and/or services specifically tailored to your interests in accordance with applicable laws.

Cookies on our services

When you use our Services, you may receive cookies from us and the third parties that collect information on our Services. We use cookies to determine that we give you a high-quality experience on our Services. We also use cookies to show you advertising that is relevant to you. If you continue to browse our website without changing your web browser's or device's settings that control cookies, you agree to receive cookies when you use our Services.

However, if you prefer, you can change your cookie settings. Some browsers have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. You may elect to reject cookies by adjusting your settings, but doing so will limit the range of features available to you on our Services and other major websites that use cookies.

Find out more about managing cookies <insert link>

Our Services also occasionally use "local shared objects" (also known as "Flash cookies"). Like browser cookies, Flash cookies may be used for coordinating content delivery, website functionality, maintaining preferences, advertising, or analytics. Unlike browser cookies, "Flash cookies" are not stored in the browser. You may be able to manage these Flash cookies by visiting the Adobe website.

What are the different types of cookies that AVTEC Limited uses?

There are four types of cookies used on our Services:

1. Essential cookies – These cookies enable you to use our Services. These cookies are essential to enable you to browse our Services and use certain features. Disabling them may prevent you from using certain parts of the Services. Without these cookies, services like shopping activity and paying activity cannot be provided. These cookies also help keep our Services safe and secure.
2. Preference cookies – These cookies store information such as your preferred country and language selection, account login data and website preferences. Without these cookies, our Services may not be able to remember certain choices you've previously made or personalize your browsing experience by providing you with relevant information. These cookies can also be used to recognize your device so that you do not have to provide the same information more than once.

3. Performance cookies – These cookies collect information about how you use our Services such as which pages you visit regularly. These cookies are used to provide you with a high-quality experience possible by doing things such as tracking page load, site response times, and error messages. They are also used to gather feedback on customer satisfaction through surveys.
4. Content / advertising cookies – These cookies gather information about your use of our Services so we may improve your experience and provide you with more relevant content and advertising. They remember that you've visited our Services and help us understand usage of our Services. Some of these cookies are from third parties that collect information about users of our Services in order to provide advertising (on our Services and elsewhere) based on users' online activities (so-called "interest-based advertising") on our Services and elsewhere online. The third parties involved in interest-based advertising collect internet browsing information (e.g., websites visited, time of visit) across different websites and over time, and they may use the information they collect on our Services to provide you ads (from us and other companies) across the internet.

Information collected by third parties on our Services

Some of the content, advertising, and functionality on our Services may be provided by third parties that are not affiliated with us. As noted above, these and other third parties may collect or receive technical information about your use of our Services, including through the use of cookies, web beacons, and other technologies, and this information may be collected over time and combined with information collected on different websites and online services.

For example, some of our Services include social network or other third-party plug-ins (such as Facebook's "Like" button) that enable you to login to certain of our Services, to comment on content available on our Services, and to share things you find on our Services with your social network. The providers of these plug-ins may be able to collect information about you even if you do not click on or otherwise interact with the plug-in or widget and regardless of whether you have an account or other relationship with these social networks and third parties. If you use social network tools or visit social networking sites, you should read their privacy disclosures to learn what information they collect, use, and share.

Also, some third parties collect information about users of our Services in order to provide interest-based advertising (on our Services and elsewhere, including across browsers and devices, also known as cross-device linking). These third parties may use the information they collect on our Services to make predictions about your interests in order to provide you ads (from us and other companies) across the internet. Some of these third parties may participate in an industry organization that gives users the opportunity to opt out of receiving ads that are tailored based on online activities. For more information about interest-based advertising and how to opt out, please visit the

Digital Advertising Alliance. Due to differences between using apps and websites on mobile devices, you may need to take additional steps to disable targeted ad technologies in mobile apps. Many mobile devices allow you to opt out of targeted advertising for mobile apps using the settings within the mobile app or your mobile device. For more information, please check your mobile settings. You also may uninstall our apps using the standard uninstall process available on your mobile device or app marketplace.

To opt out of interest-based advertising across browsers and devices, please opt out through the Digital Advertising Alliance or Network Advertising Initiative website and also through the settings within the mobile app or your mobile device. Your opt-out choice may apply only to the browser or device you are using when you opt out, so you should opt out on each of your browsers and devices if you want to disable all cross-device linking for interest-based advertising. If you opt out, you will still receive ads but they may not be as relevant to you and your interests.

How your information will be used

Our Services

We use personal information to complete transactions and fulfill requests for our products and services.

Administrative, marketing, analytical purposes

In addition to processing, confirming and fulfilling the services or products you request, AVTEC Limited may use personal information for administrative, analytical, and marketing purposes such as information systems management, accounting, billing and audits, credit card processing and verification, customer-relations correspondence, and/or operation of the Business Extra programs. AVTEC Limited also uses personal information to identify, develop and market products and services that we believe you will value, including across browsers and devices, in accordance with applicable laws.

AVTEC Limited may use your personal information for several purposes including, without limitation:

- **Business purposes and communication:** To provide customer/vendor employment or appointment , to communicate with you for business or customer service reasons, or for other such reasons such as changes to our policies or in response to your inquiry
- **Financials transaction management:** To facilitate payment for services or provide refunds

- **Legal and Regulatory Obligations:** To comply with legal, regulatory, or fiscal obligations, or in connection with litigation or an internal investigation or audit
- **Tailored web experience:** To personalize your advertising experience when visiting our sites, and to manage details about your account, when security updates are available, or when an action is required to keep the account active
- **Marketing and Analytics:** To perform data analyses and other processing for marketing purposes
- **Site maintenance:** To improve content, functionality, and usability of our sites and to offer opportunities to participate in surveys and provide feedback to us
- **Security management:** To secure AVTEC Limited's premises, assets, and information
- **Third party requests:** To respond to and comply with outside requests initiated by you, as well as in response to legal requests
- **Audit and controls:** To evaluate internal controls and audits for compliance (including those conducted by AVTEC Limited's internal and external audit service providers)

There are Closed Circuit Television (CCTV) cameras in operation within and around our stations and other premises, which are used for the following purposes:

- to prevent and detect crime;
- to protect the health and safety of AVTEC Limited's customers and employees;
- to manage and protect AVTEC Limited's property and the property of AVTEC Limited's guests and other visitors; and
- for quality assurance purposes.

Security

AVTEC Limited uses reasonable technical, administrative, and physical measures to protect your personal information. When your personal information is shared, AVTEC Limited will take a reasonable approach to prevent the unauthorized use of personal information.

Please note, however, that while AVTEC Limited attempts to safeguard your personal information, no method of transmitting or storing electronic information is ever completely secure, and thus we make no warranty, express, implied, or otherwise, that your information will never be accessed, used or released in a manner that is inconsistent with this Privacy Policy.

IN NO EVENT SHALL WE BE LIABLE FOR ANY DAMAGES (WHETHER CONSEQUENTIAL, DIRECT, INCIDENTAL, INDIRECT, PUNITIVE, SPECIAL OR OTHERWISE) ARISING OUT OF, OR IN ANY WAY CONNECTED WITH, A THIRD PARTY'S UNAUTHORIZED ACCESS TO YOUR INFORMATION, REGARDLESS OF WHETHER SUCH DAMAGES ARE BASED ON CONTRACT, STRICT LIABILITY, TORT OR OTHER THEORIES OF LIABILITY, AND ALSO REGARDLESS OF WHETHER WE ARE GIVEN ACTUAL OR CONSTRUCTIVE NOTICE THAT DAMAGES WERE POSSIBLE, EXCEPT AS PROVIDED UNDER APPLICABLE LAWS.

With whom your information will be shared

General

AVTEC Limited does not share personal information with third parties except as stated in this Privacy Policy. We may disclose information to companies affiliated with AVTEC Limited and/or unaffiliated third parties (i) to provide the products and services you have requested; and (ii) for administrative, analytical, and marketing purposes. For example, we may provide information we collect about you to third parties to distribute promotions, sweepstakes, marketing surveys, focus groups, interviews and other opportunities offered by AVTEC Limited.

In addition, from time to time, we may share information with affiliated AVTEC Limited companies such as <insert name(s) of affiliate(s)>, and with certain third party companies with which we have a business relationship, including Business Extra participants. These companies may send you offers based on the information you have provided us. Where we are required by applicable law, we will seek your consent prior to sharing your personal information with such third parties for marketing purposes. Also, as described below, you can opt out of having your information shared with third parties for those parties' direct marketing purposes by emailing us at corporate@avtec.in.

In the event we undergo a business transition involving another company, such as a merger, corporate reorganization, acquisition, the lease or sale of all or a portion of our assets, or in the event of bankruptcy, information that we have collected from or about you or your devices may be disclosed to such other entity as part of the due diligence or business integration process and will be transferred to such entity as one of the transferred assets.

Legal requirements

Further, to the extent required by law, we may disclose personal information to government authorities, or to third parties pursuant to a subpoena or other legal process, and we may also use or disclose your information as permitted by law to protect the rights or property of AVTEC Limited, our customers, our services, or its users.

Obtaining and handling your consent

By using our Services and submitting personal information to this site, you are accepting and consenting to the practices and uses described in this Privacy Policy. This Privacy Policy is not a contract. AVTEC Limited will seek to obtain your additional consent where required by applicable law.

Application of local laws

Where required by local law, you may have the right to access, update or request that we delete your personal information. To inform us of inaccuracies or changes to your personal information, please use the below contact information to reach out to AVTEC Limited. AVTEC Limited will, in accordance with applicable law, update, grant access to, or delete such information. Please note, requests to correct, transfer or delete personal information are subject to applicable legal, ethical reporting, or document retention obligations imposed on us.

When you provide us with your information, you acknowledge that this information may be stored, transferred, and processed on servers located anywhere in the World, including either inside or outside of the European Economic Area.

Links to other sites

We'd also like to remind visitors that we provide additional links to resources we think you'll find useful. These links will lead you to sites that are not affiliated with AVTEC Limited and may operate under different privacy practices. Our visitors are responsible for reviewing the privacy policies for such other websites, as we have no control over information that is submitted to these companies.

Opt out of marketing communications and sharing your information with third parties for marketing purposes

AVTEC Limited's websites do not honor web browsers' Do-Not-Track signals. You do have choices, however, when it comes to your privacy and internet browsing.

Due to differences between using apps and websites on mobile devices, you may need to take additional steps to disable targeted ad technologies in mobile apps. Many mobile devices allow you to opt out of targeted advertising for mobile apps using the settings within the mobile app or your mobile device. For more information, please check your mobile settings. You also may uninstall our apps using the standard uninstall process available on your mobile device or app marketplace.

To opt out of interest-based advertising across browsers and devices, please opt out through the settings within the mobile app or your mobile device. Your opt-out choice may apply only to the browser or device you are using when you opt out, so you should opt out on each of your browsers and devices if you want to disable all cross-device linking for interest-based advertising. If you opt out, you will still receive ads but they may not be as relevant to you and your interests.

If you want to opt out of receiving forms of communication from AVTEC Limited other than marketing email, or if you want AVTEC Limited to stop sharing your personal information with third parties for those parties' direct marketing purposes, please email corporate@avtec.in with your request. Regardless of your opt-out preferences, we reserve the right to send you certain communications and share your information with third parties for administrative and analytical purposes.

Other companies or programs of AVTEC Limited affiliates may require different steps to change your preferences for participation. Please consult the privacy policies of the relevant companies or programs for further information.

Contact us

If you have other questions, comments or concerns about our privacy practices, or if you wish to issue a request to exercise your rights where applicable by law, please contact at corporate@avtec.in. Please provide your name and contact information along with the request. Alternatively, inquiries may be mailed to the following address:

Mailing address:
(AVTEC Limited)
7th Floor, Birla Tower
25, Barakhamba Road
New Delhi-110001

Effective date

Policy is effective from November 14, 2018.