

# ESSEN COMPUTERS LTD

## Privacy Notice

### updated as of Jan 1, 2008

At Essen we recognize that privacy is important. This document outlines the types of personal information we receive and collect when you use Essen's services, as well as some of the steps we take to safeguard information. We hope this will help you make an informed decision about sharing personal information with us. This Policy applies to all of the [products, services and websites](#) offered by Essen Computers Ltd. or its subsidiaries or affiliated companies (collectively, Essen's "services").

#### Personal Information

Privileged Services available on the Essen Computers Website require the User to have a User Account. Essen Computers requires you to submit Information when you are creating a User Account, which includes, *inter alia*, your name, street address, city, state, zip code, country, phone number, email address and a password, which is used to protect your User Account from unauthorized access.

Essen Computers collects individually identifiable information from registered users to complete business transactions, deliver products and services, administer individual accounts, provide customer support and meet government regulatory requirements. We ask each registered user to choose whether to receive e-mail updates about Essen Computers products and services, and we will honor the choices made. However, notwithstanding your choice, we reserve the right to e-mail customers on rare occasions when we think it is important. We do not allow other uses or disclosures of mail or e-mail addresses of registration information.

A visitor to the Essen Computers web site is not required to reveal any individually identifiable information. We collect some information about visitors indirectly through standard web logs, including IP address, what browser is being used (e.g., Firefox), and the domain name from which a visitor entered the site (e.g., www.yourcompany.com or www.yourorganisation.org). We normally use this information in the aggregate to administer and improve our web site. Some data may be traceable to an individual, but we do not normally seek to identify individuals unless we believe that someone is using our site improperly.

Some existing customers come to our web site with IDs and passwords already assigned. Customers who register at our web site are asked to provide standard contact information, such as name, mailing and e-mail addresses, and telephone and fax numbers. We may also collect a credit card number from those who wish to buy products and services.

#### IP Information

Every time you visit the Essen Computers Website, a log file is generated on Essen Computers' computer. This contains information such as your Internet Protocol ("IP") address, how long you spent on the site and which parts of the site you viewed. Essen Computers collects this information to help diagnose problems and administer its systems, to report aggregate information to its advertisers, and to audit Website use (e.g. where Users are connecting from, what Internet Service Providers are being used, etc).

Essen Computers does not normally link IP addresses to anything that identifies you personally, which means that you remain anonymous even though Essen Computers includes your IP address in its aggregate information.

#### How this Information is used

Essen processes personal information on our servers in the United States of America / India and in other countries. In some cases, we process personal information on a server outside your own country. We may process personal information to provide our own services. In some cases, we

may process personal information on behalf of and according to the instructions of a third party, such as our affiliates / advertising partners.

When you submit Information, Essen Computers may use the same to operate, maintain, and provide to you the features and functionality of the Essen Computers Website, as well as provide special personalized features to you.

Essen Computers has a right to and may use your personal details to communicate with you by email, fax or telephone, for record-keeping purposes, in order to run your User Account (if applicable), for technical administration of the Website, for research and development, and for customer administration.

Essen Computers does not use your Information to send commercial or marketing messages without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out. Essen Computers may, however, use your email address without further consent for non-marketing or administrative purposes (such as notifying you of major Essen Computers Website changes or for customer service purposes). Essen Computers may occasionally request information from you as part of surveys and promotions.

We offer a number of services that do not require you to register including surfing Essen's website or provide any personal information to us, such as Essen Search. In order to provide our full range of services, we may collect the following types of information:

- **Information you provide** - When you sign up for an Essen Account or other Essen service or promotion that requires registration, we ask you for personal information (such as your name, email address and an account password). For certain services, such as sales of our products, we also request Bank details or other payment account information which we maintain in encrypted form on secure servers. We may combine the information you submit under your account with information from other Essen services or third parties in order to provide you with a better experience and to improve the quality of our services. For certain services, we may give you the opportunity to opt out of combining such information.
- **Essen cookies** - When you visit Essen, we send one or more cookies - a small file containing a string of characters - to your computer that uniquely identifies your browser. We use cookies to improve the quality of our service by storing user preferences and tracking user trends, such as how people search. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. We sometimes use an Internet device called a cookie to store login or other information on your computer. A cookie is a small amount of information that a web site transfers to your computer's hard drive. Many web sites use cookies to make your life as a web user easier and more engaging. We use cookies to simplify your access or to tailor our services to your needs and interests. For some services, we offer users the choice of having an ID or password stored in a cookie. We use a third-party contractor to monitor how our customers use our web site and to determine which of our online features they prefer. To provide this service, our contractor uses cookies on our behalf to report information about our customers and the products and services they order, as well as aggregated, non-identifiable information about our guests' use of our site, solely for our internal use.
- Cookies come with some protections. We do not store credit card numbers in cookies. No other site can read a cookie set by Essen Computers, and we can't read a cookie that another web site wrote to your computer. Most Internet browsers are set to accept cookies. Users can reset browsers to refuse cookies and still use our web site, although access may not be as simple nor you may be able to use the full features of Essen Computers' Website.
- Essen Computers uses cookies, clear GIFs and log file information to:
  - (a) store information so that you will not have to re-enter it during your visit or the next time you visit the Essen Computers Website;

- (b) provide custom, personalized content and information;
- (c) monitor the effectiveness of our marketing campaigns;
- (d) monitor aggregate metrics such as total number of Users, pages viewed, etc.; and
- (e) track your entries, submissions, and status in promotions, sweepstakes, and contests.

Also, Essen Computers can and will use IP addresses to identify a User when it feels it is necessary to enforce compliance with its Terms of Use, or to protect the services provided and other Users.

- **Log information** - When you use Essen's services, our servers automatically record information that your browser sends whenever you visit a website. These logs may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.
- **User communications** - When you send email or other communication to Essen, we may retain those communications in order to process your inquiries, respond to your requests and improve our services.
- **Affiliated sites** - We offer some of our services in connection with other web sites. Personal information that you provide to those sites may be sent to Essen in order to deliver the service. We process such information in accordance with this Policy. The affiliated sites may have different privacy practices and we encourage you to read their privacy policies.
- **Links** - Essen may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve the quality of our search technology, customized content and advertising.
- **Other sites** - This Privacy Policy applies to web sites and services that are owned and operated by Essen. We do not exercise control over the sites displayed as search results or links from within our various services. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you.

Essen only processes personal information for the purposes described in the applicable Privacy Policy and/or privacy notice for specific services. In addition to the above, such purposes include:

- Providing our products and services to users, including the display of customized content and advertising;
- Auditing, research and analysis in order to maintain, protect and improve our services;
- Ensuring the technical functioning of our network; and
- Developing new services.

Essen Computers uses both your personally identifiable Information as well as certain non-personally-identifiable information (such as anonymous user usage data, cookies, IP addresses, browser type, click stream data etc.) to improve the quality and design of the Essen Computers Website and to create new features, promotions, functionality, and services by storing, tracking, and analyzing User preferences and trends.

### **How this Information is protected**

You acknowledge that the internet is not a 100% secure medium for communication. However, Essen Computers endeavors to take every precaution to the best of its ability to protect any information you submit to Essen Computers and Essen Computers sends to you.

Essen Computers shall not be responsible for any damage which you or others may suffer as a result of loss of confidentiality of such information, but Essen Computers shall take every precaution to protect your information. All Information is stored on a server in a secure environment. Only employees who need the Information to perform a specific task are granted access to data that identifies you personally. Essen Computers holds regular security reviews to ensure that the website remains safe and secure.

Your User account is password-protected to prevent others from viewing your Information. You are solely responsible for maintaining the secrecy of your password(s) and/or any User Account information. It is recommended that you do not divulge your password to anyone else.

Essen Computers advises you to sign out of your User Account and close the browser window when you have finished. This is to prevent others from accessing your Information, and this is important if you share your computer with other people or use a computer in a public place such as a library or internet cafe. Essen Computers cannot ensure or guarantee the security of any Information you transmit to us or that comes to you from our online products or services. You send and receive this information at your own risk

Therefore, although Essen Computers uses industry standard practices to protect your privacy, Essen Computers does not promise, and you should not expect, that your Information will always remain private.

Essen Computers may, from time to time, ask you for further information ("Further Information") in order to update our records or for particular purposes. Essen Computers will always inform you how it intends to use any Further Information acquired from you.

From time to time, Essen Computers compiles online transaction and registration information for internal analysis such as researching and identifying market segments and needs.

Information may be shared with contractors who directly support the Internet services and who only use the information in accordance with this policy. In the ordinary course of business, we may share information with auditors, lawyers or contractors, but we require that recipients use the information only for the purpose of the disclosure and that they destroy or return the information when no longer required. When necessary or appropriate, we may disclose information in response to a court order or subpoena or when otherwise legally required. We may also disclose information if appropriate to protect our web site or our legal rights.

Some users volunteer information about their business relationships with their own customers for inclusion in Essen Computers' traditional business-to-business credit database. That information is covered by Essen Computers' privacy policy.

Any Information that you voluntarily disclose online may become, at the discretion of Essen Computers, publicly available and can be collected and used by others.

If you would like to revise any Information you have provided to Essen Computers, or feel that what the Essen Computers Website currently has on record is incorrect, you may update the Information by entering the revised data yourself by signing into your User Account. Where this is not possible, please email Essen Computers.

Through our web site, we occasionally offer users the opportunity to receive sales or promotional information for Essen Computers products and services of interest to them. A user who agrees may be asked to provide standard contact information (e.g., name, mailing address, e-mail address, telephone and fax numbers) that we will use to provide information about our products and services.

## **Your Choices**

When you sign up for a particular service that requires registration, we ask you to provide personal information. If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use.

If we propose to use personal information for any purposes other than those described in this Policy and/or in the specific service notices, we will offer you an effective way to opt out of the use of personal information for those other purposes. We will not collect or use [sensitive information](#) for purposes other than those described in this Policy and/or in the specific service notices, unless we have obtained your prior consent.

You can decline to submit personal information to any of our services, in which case Essen may not be able to provide those services to you.

Essen only shares personal information with other companies or individuals outside of Essen in the following limited circumstances:

- We have your consent. We require opt-in consent for the sharing of any sensitive personal information.
- We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Policy and any other appropriate confidentiality and security measures.
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of Essen, its users or the public as required or permitted by law.

If Essen becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.

You may, of course, decline to create a User Account and submit Information, in which case you can still use Essen Computers Services and explore the Essen Computers Website, however, without a User Account, you shall not be entitled to avail the Privileged Services.

For More Information

For more information write to us at: [info@essencomputers.com]

## **Confidentiality and Security Safeguards**

Essen Computers takes technical, administrative and physical steps to protect against anticipated hazards including unauthorized access to and disclosure of individually identifiable information. Essen Computers employees who handle confidential or proprietary information belonging to Essen Computers or its customers must treat it confidentially and may not disclose it to unauthorized third parties. Essen Computers employees are also responsible for the internal security of the information.

## **Access and Correction**

You can change your registration information, billing information and account preferences at anytime by accessing the My Account page.

## **Terms & Conditions**

Essen Computers delivers products and services through the Internet faster and more efficiently than ever before. Many measurable benefits derived from Essen Computers products and services result from the ability to freely move information. The free flow of information must be balanced against privacy and Essen Computers believes that a fair balance makes good business sense.

## **Usage Information**

Essen Computers may record information about your usage, such as when you use the Essen Computers Website, the favorites you subscribe to, and the frequency and size of data transfers, as well as information you display or click on in the Essen Computers Website (including User Interface ("UI") elements, settings, and other information). If you are logged in your User Account, Essen Computers may associate that information with your Information. Essen Computers may use clear Graphic Interchange Format ("GIF" also known as "Web Beacons") in HTML-based emails sent to the Account Holders to track which emails are opened by recipients.

## **When Information may be divulged**

Essen Computers cooperates with law enforcement inquiries, as well as other third parties to enforce laws, such as: intellectual property rights, fraud and other rights, to help protect you and the community from violations of the law. Therefore, in response to a verified request by law enforcement or other government officials relating to a criminal investigation or alleged illegal activity, Essen Computers can (and you authorize it to) disclose your Information, history, fraud complaints, and purchases and listing history without a subpoena. Essen Computers may also disclose your Information, history, fraud complaints, and purchases and listing history to law enforcement or other government officials without a subpoena, court order or substantially similar legal procedure, when it believes in good faith that the disclosure of Information, history, fraud complaints, and purchases and listing history is necessary to prevent imminent physical harm or financial loss; or report suspected illegal activity.

Due to the existing regulatory environment, Essen Computers cannot ensure that all of your Information will never be disclosed in ways not otherwise described in this Privacy Notice. By way of example (without limiting the generality of the foregoing), Essen Computers may be forced to disclose Information to the government or third parties under certain circumstances

## **Updates to the Essen Computers Privacy Policy for the Internet**

To keep up with the rapidly evolving Internet environment, Essen Computers will from time to time review and revise these practices and communicate any updates. Minor changes may be made at anytime without notice. We will update the version number and date of the notice when we do. If we make a major change in the way that we use, disclose or protect Internet registration information, we will highlight the change in this notice. If possible, we will provide advance notice of any major change through a notice on the web site.

## **Information security**

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data.

We restrict access to personal information to Essen employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

## **Data integrity**

Essen processes personal information only for the purposes for which it was collected and in accordance with this Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

## **Accessing and updating personal information**

When you use Essen's services, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Some of our services have different procedures to access, correct or delete users' personal information. We provide the details for these procedures in the specific privacy notices or FAQs for these services.

## **Enforcement**

Essen regularly reviews its compliance with this Policy. When we receive formal written complaints at this address, it is Essen's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between Essen and an individual.

## **Changes to this policy**

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Policy without your explicit consent, and we expect most such changes will be minor. Regardless, we will post any Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Policy changes). Each version of this Policy will be identified at the top of the page by its effective date, for your review.

## **Questions and Complaints**

For questions or complaints regarding Essen Computers privacy practices, please contact Essen Computers Customer Service at <http://www.essencomputers.com/webmaster> . We will do our best to resolve any problems as quickly as possible.

For more information regarding the Essen Computers privacy policy, contact:

Privacy Officer  
Essen Computers  
24 B, Jolly Maker II  
Nariman Point  
Mumbai 400 021  
India

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