

## DATA PROTECTION POLICY

### Version 3- Updated on December 19, 2021

#### WE CARE ABOUT YOUR PRIVACY

Procam International Private Limited and its group Companies (PIPL) are committed to respect your privacy and to legally comply with applicable data protection and privacy laws. This privacy policy ("Policy") describes how we collect and use personal data, who is the data controller or what is the applicability of this Policy.

**"Personal data"** means information relating to an individual.

**"Event/s"** shall mean any or all of the following:

- Tata Mumbai Marathon
- Delhi Half Marathon
- Tata Consultancy Services World 10K
- Tata Steel Kolkata 25K
- Sunfeast India Run As One
- Any other Event that PIPL is promoting, endorsing or franchising

#### **What information do we collect?**

We collect your personal data and other information when you register yourself as a Participant for any of the events promoted by PIPL or when you otherwise interact with us.

#### **Information you provide us with:**

When you create an account and/ or participate in PIPL promoted events or otherwise interact with us, you provide us with information such as your

- Identity data name, email address, phone number, residential address (including photographs, video grabs, TV footage etc),
- Financial data,
- Technical data,
- Statistical data,
- Medical Data
- Demographic data and
- Such other data that shall be incidental to your previous and present actions **All of the above shall constitute Personal Data**

### **What is the purpose of Personal Data processing?**

PIPL or any authorised third party may process your personal data for the following purposes, out of which one or more purposes may apply simultaneously.

- To facilitate participation/registration
- To facilitate, record and publish participation confirmation, results and race timings
- To record and display performance of a participant
- To televise/film/record/photograph the event footage and publish the same
- To deliver the applicable published gratification like Certificates/ Medals/Prize Money/ Products etc.,
- To send regular Event related updates/information
- To advertise/ promote to you present and future endeavours of PIPL and/or brands and products associated with PIPL
- For the purpose of data analysis
- For logistics and operational purposes
- For security purposes
- For legal purposes
- For health safety purposes
- For promotional purposes of PIPL promoted Events (present and future)
- For accounting purposes
- To send Event related communication to the participant through WhatsApp
- For compliance with the COVID-19 related rules/regulations/guidelines/protocol as laid down by the Central Govt. and/or the State Govt. from time to time, and for adhering to event related guidelines.
- For allied verification purposes, wherever required

### **What is PIPL's legal basis for processing your Personal Data?**

Our legal basis for processing your personal data is dependent on the purpose for processing. In general, we process your personal data under the following legal basis:

- **Performance of a contract with you:**

Collection of personal data is essential by law and under the terms of Contract to facilitate the process of Registration

- **Your consent**

We process your personal data only if you have consented to the processing activity. You may revoke your consent at any time. Doing so will bar us from further processing of your personal data based on your consent, but will not impact the lawfulness of processing based on your consent before it was withdrawn.

- **Legal obligations**

We process your personal data as needed to comply with laws and regulations

- **Legitimate interests**

We process your personal data to further our legitimate interests, such as in connection with managing, organizing, developing, marketing, promoting, advertising the Event and in limited circumstances the operations of PIPL and the brands and entities associated with it. Any such processing is conducted subject to appropriate measures to protect your fundamental rights and freedoms related to your personal data, and in any event will be subject to the restrictions provided in this Policy.

### **Do we share Personal Data?**

We do not sell, lease, rent or otherwise disclose your personal data to any third party (i.e. entity other than PIPL, its group companies and entities & brands associated with PIPL) unless otherwise stated below. PIPL and authorized third parties who process personal data for PIPL for the purposes described in this Policy. These authorized third parties are not permitted to use your personal data for any other purposes. We bind them contractually, require them to act consistently with this Policy and to use appropriate security measures to protect your personal data.

### **Mandatory disclosures**

We may be obligated by mandatory law to disclose your personal data to certain authorities or other third parties, for example, to law enforcement agencies acting for the security of the participants. We may also disclose and otherwise process your personal data in accordance with applicable law to defend PIPL's legitimate interests.

### **How do we address Data Quality?**

We take reasonable steps to keep the personal data we possess accurate and to delete incorrect or unnecessary personal data. We encourage you to access your personal data through your account from time to time to ensure that it is up to date.

### **What steps are taken to safeguard Personal Data?**

Privacy and security are key considerations in the data processing. We have assigned specific responsibilities to address privacy and security related matters. We enforce our internal policies and guidelines through an appropriate selection of activities, including proactive and reactive risk management, security and privacy engineering, training and assessments. We take

appropriate steps to address online security, physical security, risk of data loss and other such risks taking into consideration the risk represented by the processing and the nature of the data being protected. Also, we limit access to our data bases containing personal data to authorized persons having a justified need to access such information.

### **What are your rights?**

You have a right to know what personal data we hold about you, and to access it. You have a right to have incomplete, incorrect, unnecessary or outdated personal data updated. You have the right to request that your personal data be erased, and to obtain a copy of your data in a machinereadable format. You have the right to refrain from the process of registration for any event, if you do not want to share your personal data. You may exercise your rights by contacting us or by managing your account and choices through available profile management tools on PIPL's website. In some cases, especially if you wish us to delete or stop processing your personal data, this may also mean that we may not be able to continue to provide any further assistance to you with regards to participation or registration. Applicable data protection law may provide certain restrictions on the extent to which these rights may be exercised. If a restriction applies, we will respond to your request with an explanation of what action will be taken, to the extent required under applicable data protection law.

### **Who is the controller of your Personal Data?**

Mr. Pratik Acharya- Vice President - Registration.

Email ID : [Info@procam.in](mailto:Info@procam.in)

### **Changes to this Privacy Policy**

PIPL may, from time to time, change this Policy or change, modify or withdraw access to this site at any time with or without notice. However, if this Policy is changed in a material, adverse way, PIPL will post a notice advising of such change at the beginning of this Policy and on this site's home page for 30 days. We recommend that you re-visit this Policy from time to time to learn of any such changes to this Policy.