

## PRIVACY POLICY

### INTRODUCTION

Duncan Engineering ("Duncan" or "We" or "Us" or "Our") owns and operates [www.duncanengg.com](http://www.duncanengg.com) ("Website"). We respect and understand the importance of protecting User's (You, Your) privacy. We are committed to safeguarding the privacy of the personal data or information ("Info") that We collect, possess, use, process, record, store, transfer, disclose, deal, handle and receive from You while rendering services in connection with Our businesses respect the privacy of our users. We maintain the highest standards for secure transactions and user information privacy. Please read the following statement to learn about our information gathering and dissemination practices.

This Privacy Policy provides you with details about the manner in which your data is collected, stored & used by us. By using/accessing this website as defined for business and/or personal use, indicate that the user understands, agrees, and consents to this privacy policy.

### SCOPE AND APPLICABILITY

This Privacy Policy (the "Policy") applies to Duncan, its affiliates and its subsidiary companies, its employees, staff and team members who collect, possess, use, process, record, store, transfer, disclose, deal, handle and receive, Info from You and third parties including but not limited to any consultants, contractors, advisors, accountants, agents, person, representatives of Duncan and/or service providers etc. who provide services to or on Duncan's behalf in connection with its business ("Third Party").

### AMENDMENT OF PRIVACY POLICY

Our Privacy Policy is subject to change at any time without notice and the same shall be updated and available on this website from time to time. Though every effort would be made to keep you informed of the changes, if any, to the policy, you are kindly advised to review the policy periodically.

### COLLECTION OF YOUR INFORMATION

We may collect information about you in a variety of ways. The information we may collect on the Site includes:

- Personally identifiable information such as your Name, E-mail Address, Mobile Number, Nature of Business and other details you voluntarily give to us when you contact us through the Site.
- Information our servers automatically collect when you access the Site, such as your IP address, your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site.
- User information from social networking sites, such as your name, your social network username, location, gender, birth date, email address, profile picture, and public data for contacts, if you connect your account to such social networks.
- Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the Site permission to access this information.
- We may use tracking tools like Google Analytics and browser cookies for collecting information about your usage of our website and
- Geo-Location Information. We may request access or permission to and track location-based information from your device, either continuously or while you are using our website, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

## **Duncan Engineering Limited**

(Formerly known as Schrader Duncan Limited)

*Registered Office & Plant*

F-33, Ranjangaon MIDC, Karegaon, Tal. Shirur, Dist. Pune - 412 220 India

Telephone : +91 2138 660-066

Email : [del@duncanengg.com](mailto:del@duncanengg.com) Web : [www.duncanengg.com](http://www.duncanengg.com)

CIN : L28991PN1961PLC139151

Provided that any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as Info for the purposes of this Policy.

## USE OF YOUR INFORMATION

We may use the information about you for:

- Our business processes, operations and management including but not limited to performance of the business, operation of the services, entering or performing any contract, maintaining quality of the services, providing support to the products You have obtained from Us.
- processing order(s), corresponding with You, fulfilling Your transaction requests, and delivering the products requested by You.
- providing You with information or products that You request from Us or which We feel may interest You, record keeping and other general administrative and services related processes.
- ensuring the safety and protection of Our rights or property or Our business.
- complying with applicable legal requirements including but not limited to governmental reporting, etc and fulfilling statutory/legal obligations under applicable laws, adhering to judicial or administrative orders, compliance with laws.
- contacting You via surveys to conduct research about Your opinion of current services or of potential new services that may be offered by Us.
- monitoring or recording of certain calls, chats and other interactions relating to the online transactions which may involve You calling Us or Us calling You and online chats for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.
- while conducting daily business/operations such Info may be provided to Our affiliates and associate companies, Our employees/staff and Third Party for the purpose of processing such Info for or on Our behalf including but not limited to helping Us to perform statistical analysis, send You email or postal mail, provide customer support/support services, arrange for deliveries of programs, products, information, and services etc.
- direct marketing and promotional purposes.
- operating Website, improving the content of Our Website to offer You better products and/or services and to ensure that content from our website is presented in the most effective manner for You; and
- to help diagnose problems with Our server, and to administer Our Website. Your IP address is also used to help identify You and to gather broad demographic information, and in connection with Our business

## SHARING YOUR INFORMATION

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

- For Business Purposes: to (i) the appropriate employees/staff/persons in Our offices; (ii) Our affiliates and associate companies; (iii) to Our different offices within India and outside India in accordance with the IT Act; (iv) to any Third Party, in the event of a proposed or actual business transfer; and (v) in connection with Our business and services provided by Us.
- To Third Parties: working with Us or on Our behalf in different industries and categories of business. We will disclose, share, transfer or provide Your Info to any Third Party in connection with Our business requirements or for the purposes indicated herein. Such Third Party are required to process Your Info they receive from Us in a lawful, safe, and responsible manner in accordance with this Policy and the prevailing laws and take all appropriate security and confidentiality measures such that they do not use Your Info for their own purposes or disclose Your Info to others. Neither We nor any Third Party will publish Your Info.
- For Legal Requirement: to any court of law and/or government agencies/entity as may be required under law and/or statutory authority, Reserve Bank of India and Credit Information Bureau India Ltd ("CIBIL") or in response to a legal process, for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences and/or to any Third Party by an order under the applicable law or if We determine it is necessary or desirable to comply with any applicable law regulation, legal process or enforceable governmental request or to protect or defend Our rights or property including compliance with accounting and tax

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- rules and regulations or to investigate detect, prevent, or take action regarding illegal activities, suspected fraud, security or technical issues or situations involving potential threats to the physical safety of any person.
- For Centralized Data Processing Activities: We have centralized certain aspects of Our data processing and administration in order to allow Us to manage Our business in better ways. Such centralization may result in the transfer of Your Info: (i) from one country to another; (ii) to Our employees/staff of the affiliates/associate companies of Duncan in other locations etc. However, whenever Your Info is transferred within Duncan, it will be processed in accordance with the terms and conditions of this Policy.

## STORAGE AND RETENTION INFORMATION

- We store your data on online servers ensuring the best possible protection from our end. We intend to protect it in encrypted format and also take back-up at defined intervals to ensure there is minimum data loss in case of any unfortunate server crash;
- We retain your information after we cease providing Services to you, even if you close your account, to the extent necessary to comply with our legal and regulatory obligations, and for the purpose of fraud monitoring, detection, and prevention and
- We also retain your information to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods that we support. Where we retain data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

## INFORMATION SECURITY

We employ a variety of technical and organizational measures to keep your personal information safe and to prevent unauthorized access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

## JURISDICTION

If you choose to visit the website, your visit and any dispute over privacy is subject to this Policy and Terms and Conditions of Use. In addition to the foregoing, any disputes arising under this Policy shall be governed by the laws of India and exclusive jurisdiction of the courts located at Pune region.

## COOKIES

- Certain parts of our Site use “cookies” to keep track of your visit and to help you navigate between sections. A cookie is a small data file that certain websites store on your computer’s hard-drive when you visit such websites. Cookies can contain information such as your user ID and the pages you have visited. The only personal information a cookie contains is information that you have personally supplied.
- We use cookies on our Site to enable us to deliver content that is specific to your interests and gives us an idea of which parts of the Site you are visiting and to recognize you when you return to the Site. Reading cookies does not give us access to other information on your computer’s hard-drive and our Site will not read cookies created by other websites that you have visited.
- You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. If, however, you select this setting you may be unable to access certain parts of the Site. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you access the Site.
- Please note providers of third party content may also use cookies over which we have no control. For detailed information on the cookies we use and the purposes for which we use them see the table at the end of the policy.

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## EMAILS AND COMMUNICATION

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the Site;
- Contacting us using the contact information provided on the Website

## GRIEVANCE POLICY

Any complaints, abuse or concerns with regards to the use, processing and disclosure of Information provided by you or breach of these terms should immediately be informed by mailing our grievance officer.

Kamal Saria  
CFO  
kamal.saria@duncanengg.com

Your privacy is extremely important to us. Upon acceptance of these Terms of Use, you confirm that you have read, understood and unequivocally accepted our Privacy Policy.



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