

Privacy Policy

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Revision History

Version-1 (v1) Release	Apr, 2021
Version-2 (v2) Release	Jun 2022
Version-3 (v3) Release	Oct 2023

PRIVACY POLICY

This Privacy Policy (“**Policy**”) applies to everyone who visits this website, <https://spalba.com/>, for the collection, use, processing, storage, transfer, and disclosure of Personal Information that we may collect or observe. We treat all the information about any transaction you have with us as highly confidential.

We reserve the right to change this policy at any given time, of which you will be promptly updated. If you want to make sure that you are up to date with the latest changes, we advise you to frequently visit this page. This Policy may be read in conjunction with the Terms and Conditions and any other policy uploaded and updated by us over the website.

Personal Information

“*Personal Information*” is information relating to, directly or indirectly, an identified or identifiable natural person. This includes things like your name, postal address, telephone number, and email address, as well as less obvious information.

Following are the categories of Personal Information which may be collected by us during your visit to the website or at the time of using of services at our website:

- (i) Individual Identification Information: Includes information like your name, email address, physical address, telephone number, login *alias*, IP address or Other Information (*defined hereunder*) that identifies you.
- (ii) Inferences: Includes customer profiles, usage preferences, or other information about an individual’s anticipated or assumed actions or behaviors.
- (iii) Individual Records: Includes information like your credentials, records, documents, account related documents, other identification information, or Other Information that relates to you as a user of this website.
- (iv) Commercial Information: Includes payment card data, financial account information, account information, incidental financial records and information, and Other Information necessary to collect and process payment for availing services from this website.
- (v) Electronic Network Information: Includes information like browser and device data, and internet or network activity information, such as activity on this website and services, data collected through cookies, pixel tags and other technologies, and Other Information that is generated through your use of the internet to access the website.
- (vi) Geolocation Data: Includes information such as your precise location or city, state, county, or country, if you have such geolocation data enabled when using the applicable social media application.
- (vii) Audio, electronic, visual, or similar information: Includes information that is captured on audio or video recording, such as if a telephone or video call is recorded, or simply observable in such interaction or in an offline context.
- (viii) Professional and Employment Related Information: Includes your contact details, user name and password to be able to access the website if you make such information publicly available in the context from which the Personal Information is collected, such as in your publicly available social media accounts, through a resume submitted to us, or by attending a professional event associated with the affiliate entities of this website. This may also include your work authorization status, skills, information relating to references and any other information you elect to provide to us.
- (ix) Sensitive Information Protected under Law: Includes characteristics of protected classifications under law, such as information about your age, race, religion, gender, gender identity, sexual preference, disability, political preference, trade union membership, philosophical views, marital status, medical or health information, genetic or biometric information, biometric templates, veteran status, background check information, judicial data or information on other judicial or administrative proceedings, or other pieces of information of particularly sensitive nature, if you

make such information publicly available in the context from which the Personal Information is collected, such as in your publicly available social media accounts, through a resume submitted to us, or by attending a professional event associated the affiliate entities of this website.

Other Information

“Other Information” means any information that does not reveal your specific identity or does not directly relate to an identifiable individual, such as browser and device data, App usage data, data collected through cookies, pixel tags and other technologies, demographic information and other data provided by you that does not reveal your specific identity, or other types of information that has been aggregated in a manner such that it no longer reveals your specific identity.

Uses and Disclosures of Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

Collection of Other Information

If we are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Privacy Policy.

No Sale of Personal Information

We do not sell the Personal Information collected in any context under this Privacy Policy.

Purpose for Collecting the Data

Unless otherwise limited by the context in which it was collected, Personal Information collected on this website is used for our legitimate business purposes, including:

- For improving the content of this website, for example, by incorporating information that is relevant for rendering of the services availed for by the end user;
- For preventing fraud or other illegal activities, such as willful attacks on the website information technology systems of this website or the associated platforms of this website;
- For data analysis, for example, to improve the efficiency of this website along with its associated platforms.
- For audits, to verify that our internal processes function as intended and address compliance with legal, regulatory or contractual requirements;
- For developing new services;
- For enhancing, improving, or modifying our current services;
- For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users;
- For operating and expanding our business activities, for example, understanding which parts of this website and any of its associated entities are of most interest to our users so we can focus our energies on meeting our users’ interests.

Data Retention

We seek to retain user’s information only as needed to fulfil the purposes described in this Policy unless a longer retention period is required by law or regulations of land.

You hereby acknowledge to indemnify us from any loss, harm, cost or claim, that may arise due to any act, omission or commission committed by you and therefore, disclaims itself from any liability, thereof.

Communications or utilization information

Through your use of telecommunications services to access the platform / website, your communications data (e.g. internet protocol (“IP”) address) or utilization data (e.g. information on the beginning, end and extent of each access, and information on the telecommunications services you accessed) are technically generated. Your IP address is automatically assigned to your computer by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the platform / website, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the website and its associated platforms. We may also derive your approximate location from your IP address.

Information collected automatically through your browser or device

When you access our website or any associated platform, we may automatically collect information such as type of Internet browser and operating system used, domain name of the website from which you came, number of visits, average time spent on the site, pages viewed. We use this information to ensure the website and associated platform functions properly, monitor the relevancy of the website and other associated platforms and improve their performance or content.

Cookie Policy

A cookie is a piece of electronic network information that is stored on your computer’s hard drive by your web browser. When you revisit or website, our server recognizes the cookie, giving us information about your prior visits. Most browsers accept cookies automatically, but you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you can still use most of the features of the website and its associated platforms. We do not currently respond to browser do-not-track signals.

Please note that cookies don't allow us to gain control of your computer in any way. They are strictly used to monitor which pages you find useful and which you do not so that we can provide a better experience for you.

Safeguarding and Securing the Data

We are committed to securing your data and keeping it confidential. We have done all in our power to prevent data theft, unauthorized access, and disclosure by implementing the latest technologies and software, which help us safeguard all the information we collect online.

Personal Information and Other Information stored in our website database is protected with a secured login with authentication, assignment of a unique ID to each person with computer access, regular passcode changes, and user IDs are deactivated or terminated as and when needed.

We use reasonable and appropriate technical and organizational security measures to protect Personal Information and Other Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure.

Third-party websites and our website

The website may contain links to other websites or services. We shall not be responsible for the privacy, information or other practices of third parties, including any third party operating any website or service to which our website links, or for the content of other website. The inclusion of a link on our website does not imply endorsement of the linked website or service by us or by our subsidiaries. Upon accessing the third-party website link and upon accessing any such website, you shall be bound by the privacy policy and terms of use of that particular website and we shall not be held responsible or liable in any manner for any occurrence of default at the time of using such website. Make sure to read the privacy policy documentation of the website you go to from our website.

Cross-border Transfers

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using our website and its associated platforms, you understand that your information will be transferred to countries outside of your country of residence, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information to which you acknowledge to give your consent, thereby.

Updates and Amendments

We may change this Policy from time to time, at our sole discretion. Any and all changes will be reflected on this page. Substantive changes may also be announced through the standard mechanisms by which we communicate with our users and community. You should periodically check this Policy for any changes to the current Policy.

By using or visiting this website, each user or visitor is implicitly accepting this Privacy Policy.