

 PROMETHEUS GROUP	Privacy Policy		Doc. No.:	UGI-IMS-PD-02
			Ver. No.:	5.4
	Security Classification:	Unrestricted	Eff. Date:	17-May-2021

Privacy Policy

Doc No.:	UGI-IMS-PD-02
Version:	5.4
Date of Revision:	17-May-2021
Authored by:	Ravikumara S D
Reviewed by:	Jayanandan P
Approved by:	Ryan Nealy
Security Classification:	Unrestricted

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Revision History

Ver. No.	Effective Date	Section / Page Number	Change Description	Authored by	Reviewed By	Approved By
3.0	06-Jun-2014	Entire Document	Initial Release	Jayanandan	TNR	PNS
3.1	01-Sep-2014	Templates changed	NA	Akanksha	Jayanandan	PNS
4.0	01-May-2016	Templates changed	Template Changed, Company logo Changed	Stephen Pinto	Jayanandan	PNS
4.1	15-May-2017	-	Reviewed as part of annual review and no changes made	Rajasekhar	Jayanandan	PNS
4.2	23-Oct-2018	Entire Document	Revamped the policy against GDPR	Rajasekhar	Jayanandan	PNS
5.0	10-Dec-2018	Entire document	Reviewed as part of annual review. Document numbering format has been changed from MSM to IMS	Rajasekhar	Jayanandan	PNS
5.1	16-Mar-2020	Entire document	Reviewed and formatting has been done	Ravikumara S D	Rajasekhar	PNS
5.2	04-Sep-2020	Entire document	Updated the policy against CCPA	Ravikumara S D	Rajasekhar	PNS
5.3	16-Nov-2020	Section 9	Added "Review" section. New logo updated	Ravikumara S D	Rajasekhar Jilla	PNS
5.4	17-May-2021	Entire document	Reviewed and updated the DPO contact details. PG Logo updated.	Ravikumara S D	Jayanandan P	Ryan Nealy

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1. Privacy Policy

Utopia is a Prometheus Group company. Utopia recognizes the importance of privacy and sensitivity of personal information. As handlers of data we have a professional obligation to keep all classified information we receive from data subjects confidential.

Utopia is committed to protecting any personal information/data that is collected, held, processed or used by Utopia during provision of our services or product. The Utopia Global Privacy Policy (“Policy”) outlines how we manage personal information of employees, stake holders (both internal & external), and all personnel directly or indirectly involved and safeguard their privacy.

Utopia is responsible for the personal information we handle. To ensure our accountability, we have developed this Policy and trained our employees, contractors, agents and all third parties about our policies and practices. We reserve the right to modify this Policy from time to time.

If we make any material changes, we will notify you by updating the Policy on our website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

2. Applicability

This privacy policy is applicable for all customers, candidates seeking employment at utopia, employees, contractors, and suppliers whose personally identifiable information (PII) are collected, maintained and/or processed by Utopia.

Statues and regulations applied are General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA)

3. Definitions

Data Subject is an identified or identifiable natural person(s). Data subjects are human beings from whom or about whom you collect information in connection with our business and its operations.

Personal Data means any information relating to an identified or identifiable natural person (“data subject”, “you”, “your”, “their”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her. Silence, pre-ticked boxes or inactivity should not therefore constitute consent. When the processing has multiple purposes, consent should be given for all of them.

Data Processor means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller;

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Data Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by Union or Member State law.

4. Gathering Personal Information

Utopia may collect, maintain and use your personal data that may have been provided to the various departments including but not limited to Human Resources, Talent Acquisition, Finance, Marketing, Sales and Travel.

4.1 Personal Data you provide to us

Utopia collects Personal Information that you provide to us through our website or applications, and in connection with business transactions or our sales channel and business partners.

Normally, Utopia will ask for a consent in writing, but in some circumstances, we may accept oral consent. However, we will document all such oral consents. Sometimes, consent may be implied through your conduct with us. For instance, voluntary submission of resume with Utopia is an implied consent.

4.2 Personal Information we receive from third party sources

Some third parties such as our business partners and service providers provide us with Personal Information about you, such as the following:

If you interact with a third-party service to visit our sites (e.g., Facebook Connect, Google Sign-In, or Twitter etc.), or if you share content from our website through a third-party social media service, the third-party service may send us information about you. The information we receive will depend on the policies and your account settings with the third-party service.

4.3 Personal Information from advertising partners

We receive information about you from some of our service providers who assist us with marketing or promotional services related to how you interact with our websites, applications, products, services, advertisements, events or communications.

4.4 Personal Information from our website

Our website contains links to other sites, which are not governed by this Policy. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.

We use cookies to personalize content and to analyze our traffic. We do not share information about your use of our site with any advertising partners or third-party companies. Your privacy and security is important to us so we ask that you consent to the use of cookies if you continue to use our website.

Whenever you visit or interact with our sites, we may collect or store information about your interaction with our sites (“Usage Information”). This Usage Information may include:

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- IP address or any other unique identifier assigned to the device that you use to access our sites;
- The functionality and characteristics of your device, including type of browser, operating system and hardware, mobile network information, and in some cases location information;
- The URL that referred you to our sites, if any;
- Keywords searched which led you to our website
- Your activities on our sites, such as which web pages you visit, what terms you searched within our sites, and which links within our sites that you click on; and the time of day that you visited our sites and how long your visit lasted.

Note: If you choose not to provide your Personal Information that is mandatory to process your request, we may not be able to provide the corresponding service.

5. Use of Personal Information

We use the data we have about you (e.g., data you provide, data we collect from your engagement with our services and inferences we make from the data we have about you) to provide, support, personalize and develop our services.

Utopia does not share your Personal Information with third parties for marketing purposes without seeking your prior permission. For example, we do not provide our customer mailing lists to anybody else. We use your data to authorize access to our services. Our services allow you to stay informed about press releases, news, blogs and webinars.

In addition, we use your personal Information for the following:

- to contact you and respond to your questions or requests
- to interact with you during hiring process
- to engage as employee, contractor or vendor and extend necessary services
- to provide access to desirable content based on your requirements

5.1 Rights to Access and Control Your Personal Data

For Personal Data that we have about you:

- **Delete Data:** You can ask us to erase or delete all or some of your Personal Data (e.g., if it is no longer necessary to provide Services to you). **Opt-out of future data collection:** You have the option to opt-out of future data collection and communications. Your information will no longer be collected or stored until you should choose to opt-in unambiguously. Once Utopia receive and confirm your verifiable consumer request, Utopia will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.
- **Change or Correct Data:** You can edit some of your Personal Data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your Personal Data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your Personal Data is inaccurate or unlawfully held).
- **Right to know** what personal information is collected, used and shared both as to the categories and specific pieces of personal information.

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- **Right to Access and/or Take Your Data:** You can ask us for a copy of your Personal Data and can ask for a copy of Personal Data you provided in machine readable form

5.2 Securing Personal Information

Utopia takes all reasonable precautions to ensure that personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect personal information are:

- premises security;
- restricted file access to personal information;
- deploying technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access;
- internal password and security policies.
- We care about the protection of your user information and use industry standard safeguards to do so. Of course, it's important to keep in mind that no data transmission over the Internet is guaranteed to be 100% secure.

We employ many different security techniques to protect such data from unauthorized access by users inside and outside the company. However, "perfect security" does not exist on the Internet. If you are concerned that your privacy may have been breached, please contact us as provided below.

Utopia enters into all necessary agreements which includes Data Protection with all service providers to safeguard the personal data. Will review agreements to meet compliance requirements.

5.3 Exceptions to disclosure of Personal Information

Under certain circumstances, Utopia will disclose personal information:

- when required or authorized by law to do so, for example if a court issues a subpoena;
- when you have consented to the disclosure;
- when the services we are providing to you, requires us share your information to third parties, their consent will be implied, unless they tell us otherwise;
- if we engage a third party to provide administrative services to us and the third party is bound by our Policy;
- if the information is already publicly known.
- Whenever it is legal and practicable, we may offer the opportunity to deal with general inquiries without providing your name.

5.4 In the Event of Sale or Bankruptcy:

The ownership of the Company may change at some point in the future. Should that occur, we want this Company to be able to maintain a relationship with you. In the event of a sale, merger, public offering, bankruptcy, your information may be shared with the person or business that owns or controls. Opting out of receiving information from third parties will not affect our right to transfer your information to a new owner, but your choices will continue to be respected regarding the use of your information.

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6. Credit Bureaus

To help us make credit decisions about customers, prevent fraud, check the identity of new customers and prevent money-laundering, we may on occasion, request information about them from the files of consumer reporting agencies.

The law of the countries we are operating require us to confirm the identity of all customers. It may also require us to disclose information in relation to cash transactions as part of tax returns.

7. Rights of Data Subjects

A resident of the European Union and California residents is entitled to the following Data Protection rights:

- Can ask us to access, correct, update or request deletion of Personal Information/Data at any time by contacting us as provided below;
- We will not process your user information without a lawful basis to do so, as such bases are defined in Article 6 of the GDPR, Object to processing of Personal Information and ask us to restrict processing of Personal Information or request portability of Personal Information. Again, one can exercise these rights by contacting us as provided below;
- Where Utopia derives the custody or control of the Personal Information through its customers, the customer will be the Data Controller and all requests for access to Personal Information should be forwarded through such Data Controller to Utopia; such data will be processed under controlled conditions as part of project delivery. These are considered as customer property.
- One has the right to opt-out of marketing communications, Utopia sends many times. One can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us as provided below;
- Utopia will not sell the personal information of consumers of any age.
- Similarly, if Utopia has collected and processed Personal Information with consent, then the consent may be withdrawn at any time. Withdrawal of consent will not affect the lawfulness of any processing Utopia has conducted prior to withdrawal, nor will it affect processing of Personal Information conducted in reliance on lawful processing grounds other than consent;
- One has the right to complain to a Data Protection Authority about our collection and use of Personal Information. However, please notify Utopia at least 36 hours before going to the Authorities, the reason of complaint as such complaint can be avoided if Utopia able to mitigate the concern. Please contact Utopia using the contact details below. For more information, please contact European local Data Protection Authority. (Contact details for data protection authorities in the European economic area, Switzerland and certain non-European countries (including the US and Canada) are available here);
- This Policy is intended to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the “General Data Protection Regulation” or “GDPR”) and California Consumer Privacy Act of 2018 (“CCPA”). Provide appropriate protection and care with respect to the treatment of your user information in accordance with the GDPR and CCPA.

Utopia responds to all requests received from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

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Non-Discrimination

Utopia will not discriminate against the personal for exercising any of GDPR and CCPA rights.

8. Contact Us

Name: Ryan Nealy

Title: Data Protection Officer

Email ID: dpo@prometheusgroup.com

Phone Number: +1 (919) 378-2220

Mailing Address:

55, Baker Street, London, W1U 7EU, United Kingdom

9. Review

This policy will be reviewed and updated at least annually (from the date of previous review), or as needed, to ensure that the policy remains aligned with changes to relevant laws, contractually obligations and best practice.

*** * * End of document * * ***