



Last updated on 21st April 2020

Xebia: Privacy Policy

This is the Privacy Policy of Xebia IT Architects India Private Limited and its Parent Company and affiliates (“we”, “us”, “our”, “ours”, or “ourselves”) and explains what we do with the information we collect about the people (“you”, “your” or “yours”) visiting our website(s), including xebia.com, training.xebia.com, xebialabs.com, godatadriven.com, xebialabs.com, stackstate.com, xpirit.com, or any other website of ours. This information can include, but is not limited to, names, e-mail addresses, phone numbers, billing information, social media account information, as well as (other) information that qualifies as ‘personal data’ as defined Section 2 a) of the European Privacy Regulation (95/46/EG). We have this information because you actively share it with us, or because we’ve collected it by using cookies. If you want to know more about what cookies are and how we use them, please take a look at our Cookie Policy in the second section of this document.

What do we do with your information?

In general..

In general, we use your information to improve our websites/ application(s) products and services and provide services/products to you. More specifically, we might use the information we collect to:

- ┆ Provide you with the services and products you have requested;
- ┆ Send you records regarding our relationship or your transactions;
- ┆ Notify you about new features, products, and special events;
- ┆ Provide you with marketing communications about our products and services as well as third party products and services we think may be of interest to you; and send you newsletters;
- ┆ Personalize and deliver content and advertising on our products and services;
- ┆ Test changes and develop new features, products and services;
- ┆ Generate and review data and reports describing our user base and usage patterns;
- ┆ Analyze the accuracy, effectiveness, usability, or popularity of our applications, websites, and perform research;
- ┆ Verify your identity, deter and prevent fraud, and enforce the legal terms that govern your use of our applications, website(s), products and services; and
- ┆ Resolve disputes and troubleshoot our applications, website(s), products and services.



But also.

- ┆ We may obtain information about you from other sources such as, but not limited to, affiliates under common ownership or control with us.
- ┆ We may combine information that we collect or receive via our website(s) with information we obtain from other sources and use it as described in this Privacy Policy.
- ┆ We may aggregate and/or de-identify the information we collect to limit or prevent identification of any user or device.

How do we share your information?

We do not rent, sell, or share your information with third parties except as described in this Privacy Policy. We may share your information with the following types of recipients and for the following purposes:

- ┆ **Service providers:** We may share your information with third parties that we refer to as service providers to assist us in providing services to you. For example, we might use these third parties to provide search technology, advertising services, authentication systems, bill collection and fulfillment, fraud detection, customer support, and recruiting. Our contracts with service providers contain terms governing their use of your data.
- ┆ **Affiliates:** We may share your information with other companies under common ownership or control with one or more affiliates within our legal group.
- ┆ **Safety, security, and compliance with law:** We may share your information when we believe in good faith that such sharing is reasonably necessary to investigate, prevent, or take action regarding possible illegal activities or to comply with legal process (e.g., a subpoena).
- ┆ **Business Transactions:** As we develop our business, we may sell, buy, merge or partner with other companies or businesses, or sell some or all of our assets. In such transactions, your information may be among the transferred assets.
- ┆ **Consent.** We may share your information in other ways and for new purposes if you have asked us to do so or have consented to such sharing.

We limit the scope of the information provided to third parties, and we allow its use only for the purposes for which it was disclosed.



Data retention

We will retain your information for as long as you use our products and/or services or as necessary for legitimate business purposes.

E-mail and direct marketing choices

We provide opt-out information in all commercial email messages we send via an “unsubscribe” link. We reserve the right to send one message confirming your opt-out from a messaging program. Please note that it may take us some time to process your requests consistent with applicable law and applicable legislation on the processing of personal data.

How we protect your information

We employ commercially reasonable physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access to your information. We choose these safeguards based on the sensitivity of the information that we collect, process and store and the current state of technology.

Although we take measures to safeguard against unauthorized disclosures of information, the Internet, our website(s)/ application(s), nor our products and services are 100% secure so we cannot assure you that information we collect or store will be protected from all unauthorized access and thereby used in a manner that is inconsistent with this Privacy Policy.

For information that is being transferred outside of the Indian Territory to, for example, the United States, we have taken technical and organizational measures designed to safeguard your information and protect it – in the case of personal data – from unlawful processing or loss.

Changes to this Privacy Policy

By using our website(s), you agree to the terms and conditions contained in this Privacy Policy. We reserve the right to amend this Privacy Policy from time to time to reflect changes in the law, our data collection and use practices, the features of our website(s), or advances in technology.

Please check this page periodically for changes. Our use of the information we collect is subject to the Privacy Policy in effect at the time such information is used. If we make any material changes to this Privacy Policy, we will post the changes here and may notify you by email or other means before the change takes effect. Please



Children's Privacy

Our website(s) / application(s) are a general audience site, and we do not intend to market to or collect, nor do we knowingly collect, personal information from children under the age of 18. Unfortunately, we cannot always determine the age of a visitor to our website(s)/ application(s) or the sender of an email.

Right to be forgotten.

In certain circumstances you have the right to have your personal data deleted. You may make such a request at any time in writing and we will evaluate if your request should be granted.

However, this right is subject to overriding legal rights or obligations; We may be legally required to retain European customers data, including in cases of which we are legally obligated to retain all relevant records, or to conduct internal investigations, or to use European customers data (while safeguarding a specific identity) for purposes of general data security. For situations where, in accordance with the law, we determine that your data deletion request must be granted, we will do so without undue delay. To exercise this deletion right, you must submit a request to us via our privacy contact, and thereafter respond to any legitimate inquiries regarding the deletion request.

Request for inspection.

You are entitled to request confirmation if and when we process your Personal Data. You may have access to Personal Data and learn details upon request about how it is maintained and used. In some cases, you can ask us to provide you with an electronic copy of Personal Data.

Change to this Privacy Policy.

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. we will notify you of any changes by posting the new Privacy Policy on this page.

This policy is effective as of 2020-04-21



How to contact us

Please contact us at sameer.bhowmik@xebia.com or via postal mail at 4th Floor, Capital Cyberscape, Golf Course Road Ext. Sec-59 Gurugram, HR 122102 to the attention of the Legal Department if you have any questions about this Privacy Policy and/or our Cookie Policy, or if you want to exercise your right to correct, supplement, or remove the personal data we have on.

This Privacy Policy and the information processing activities performed hereunder are governed by Indian law without regard for its choice of law principles, as well as applicable Indian legislation on the processing of personal data. In case of conflict or in case you wish to exercise your right to correct, supplement and/or remove personal data we have on you, you agree to only submit them with the Indian Data Protection Authority or, in case of a civil court case, with the competent court of the city of New Delhi, India.



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Cookies Policy

Introduction

This Cookies Policy describes the information collection and use practices of Xebia IT Architects India Private Limited and its Parent Company and affiliates (“we”, “us”, “our”, “ours” or “ourselves”) and refers to the reader as “you”, “your” or “yours”. You can opt out of any data collection using cookies. To learn more about how to do this, visit the help pages of your browser. Please note, however, that if you delete cookies or do not accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly. Most browsers also provide functionality that lets you review and erase cookies, including our cookies.

What are cookies?

Cookies are small text files placed onto your computer or device as you browse the Internet. Cookies can be used to collect, store and share bits of information about your activities across websites, including on our websites that link to this Cookies Policy (“Websites”). They also allow us to remember things about your visit to our Websites, such as your preferred language and other choices/settings and generally make the site easier for you to use. We use 3 types of cookies on our Websites: functional cookies, analytical cookies, and tracking cookies. Functional cookies are necessary for our Websites to function properly. Analytical cookies are used by us to see how you find and use our Website(s). This helps us in determining how we should improve our website/application. We use tracking cookies for marketing purposes. They allow us to, for instance, send you tailored offers and newsletters.

Another example are the social media cookies that we use to collect, store, and use information that you have made public in connection with your social media account, information that social media services share with us, and information that is disclosed as being shared while connected. Please see your social media provider’s privacy policy and help center for more information about how they operate.



Functional cookies

Placed on xebia.com or any of its Application

Placed on training.xebia.com or any other URL as updated as the case maybe.

Xebia

Xebia_university_session (expires after session); XSRF-TOKEN (expires after session); cookie banner (expires after session); signup Details (expires after 365 days)

Analytical cookies

Placed on xebia.com or any other URL as updated as the case maybe.

[Google Analytics](#)

_ga (expires after 730 days); _gat (expires after session); _utma (expiresafter730 days); _utmz(expiresafter182days); _utmc (expiresafter session); _utmt_player(expiresafter session); _utmb (expires after session);

Placed on training.xebia.com or any other URL as updated as the case maybe.

[Google Analytics](#)

_ga (expires after 730 days); _gat (expires after session);

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This Privacy Policy and the information processing activities performed hereunder are governed by Indian law without regard for its choice of law principles, as well as applicable Indian legislation on the processing of personal data. In case of conflict or in case you wish to exercise your right to correct, supplement and/or remove personal data we have on you, you agree to only submit them with the Indian Data Protection Authority or, in case of a civil court case, with the competent court of the city of New Delhi, India.