



TRUSTED NOT TO COMPROMISE

# Privacy Policy

24 October 2018



Title: **PRIVACY POLICY**

Number: PP/001

Effective Date: 24 October 2018

Version: 1

## **1. Introduction:**

- 1.1. Pakistan Cables Limited ("PCL") owns the website [www.pakistancables.com](http://www.pakistancables.com) and its associated social media pages ("Sites").
- 1.2. PCL understands that privacy is important to you. This Privacy Policy ("Privacy Policy") helps you understand how PCL ("Pakistan Cables Limited", "we", "our" or "us") collects and uses the information, including Personal Data that you share when you use the Sites. It also describes the choices available to you regarding our use of your Personal Data (as defined within para 1.1) and how you can access and update this information.

## **2. Purpose:**

- 2.1. To serve as a point of reference for external stakeholders in understanding the Company's privacy policy governing personal data of users/visitors of the Company website.
- 2.2. To provide guidelines in what is expected of all external business partners/third party suppliers.

## **3. Audience:**

- 3.1. All external stakeholders

#### 4. Policy Statement:

If you submit your personal/non-personal data to this web site, we may process it for the purposes described below:

4.1 To respond to your business queries or communicate directly with you. We process your name, title, (business) contact details (including your email address, telephone number, name of your company, CNIC, NTN number, where applicable and any other information that you provide to us in the open field entry of the contact form. We may also collect non-personal-data like the type of browser and operating system you use and other details associated with the devices you use to access the Sites, (collectively "Personal Data").

When you submit your Personal Data and other information on the Site, you hereby unconditionally consent, unless revoked by you in writing, to the collection, use and/or disclosure of such information as set forth in the Privacy Policy. You are responsible for submitting accurate information to the Site.

4.2 For surveys or any other (marketing) communication We may process your Personal Data to send you surveys on our products or services or to keep you updated on events, business updates, products and services of PCL. We may create profiles and analyze your interactions with us. We process this information based on your consent, which can be withdrawn by you at any time in writing.

4.3 For product and service improvements We may process your Personal Data for various PCL business-related purposes, such as developing new products and services, enhancing, improving or modifying our websites, identifying behavioral and usage trends, and determining the effectiveness of our promotional campaigns.

4.4 For the technical management of the Site We may process your Personal Data to help you find information in a quick and easy way and to improve access to and functionality of this site. We may process your IP-address, the internet browser you use, the visited webpages, previous/next visited websites and the duration of your visit. We process this information to better understand your needs.



4.5 What Personal Data we collect and where we store them  
When you visit an Internet website, you disclose certain information about yourself such as your Internet Protocol (IP) address, the time of your visit and the referring location (the site or page that offered a link to the Sites). Information we collect includes browser information, operating system information, and the date, time, length of stay and specific pages accessed during your visits to the Sites. Click-stream data may include such information as the page requested, the source of the request, the preceding page viewed and the type of browser making the request. The Sites also collect Personal Data about you that you provide to us voluntarily, such as through the "Contact Us" section.

4.6 Why we collect these Personal Data and how we may share them  
Personal Data will be used to help us improve our Sites, get in touch with you, to familiarize you with new products and services, to send you information, and for our planning, marketing and strategic information purposes. We may use your Personal Data to customize, analyze, adjust and improve the Sites and improve our services. We may also use some of the information to provide you with important updates regarding the Sites and services, such as changes to this Privacy Policy, our Terms of Use and our other policies.

We do not sell your Personal Data to third parties. We may, however, share Personal Data in the following cases:

**(a)** Personal Data may be disclosed or otherwise transferred as necessary to third parties under contract with us to improve and provide services associated with PCL. Examples include, but are not limited to, customer support specialists and web hosting companies. Upon such transfer, your Personal Data shall be used in accordance with the relevant third parties' data privacy policies/procedures that may be shared on a case-to-case basis.

**(b)** In addition, we may provide your name and postal and email address to select companies for our marketing purposes, unless you opt out of this use. We may use your Personal Data for our newsletters or emails about our products and services (this information contains a subscriber link allowing you to opt out)



- (c) When you visit our Sites, we may collect click-stream data for purposes of our system administration.
- (d) We may disclose any information, including, without limitation, Personal Data, we deem necessary, in our sole discretion and without your prior permission, to comply with any applicable law such as to comply with a summon, regulation, orders of a data protection agency, legal process or governmental request. PCL reserves the right to disclose your Personal Data if we believe you have or are violating our policies, or in order to protect or defend PCL's rights or property, even without a subpoena, warrant or other court order.
- (e) Personal Data may be disclosed or distributed to another party with which PCL enters, or may reasonably enter, into a corporate transaction, such as for example, a merger, consolidation, acquisition or asset purchase. In the unlikely event of a bankruptcy, insolvency or liquidation, the database containing Personal Data may be treated as an asset of PCL and may be subject to transfer to a third party.

#### **4.7 Data Security**

Your Personal Data is treated confidentially and we have taken technical and organizational security measures against loss or unlawful processing of this data. We use several security techniques including secure servers, firewalls and encryption, as well as physical safeguard of the locations where data are stored. For example, we use industry-accepted tools and techniques to protect against unauthorized access to our systems. However, we have no control over the security of other websites or applications that you might visit or use even when a link to those websites or applications is available through the site. If you share your computer or use a computer that is accessed by the public, remember to sign off and close your computer or device when you have finished your session. This will help to ensure that others cannot access your Personal Data.

Our links to other websites The Sites contain links to other websites. If you access a third party site from a link on any of Sites, any information you disclose on that site is not subject to this Privacy Policy. It is your obligation to review and understand the privacy practices and policies of these other websites.



#### 4.8 No Services for Minors

We do not knowingly collect information from minors. To use the Sites, you must be the age of legal majority in your place of residence. We do not use an application or other mechanism to determine the age of users of the Sites and to provide any services. All information provided to PCL will be treated as if an adult provided it. If, however, we learn that a minor has submitted information about himself/herself to us, we will make reasonable efforts to delete the information as soon as practicable.

#### 4.9 Your Options to Opt-Out and to Inquire What Personal Data We Store About You

You may opt out of having your Personal Data used by the Sites for disclosure to third parties. To do so, please contact PCL via email at [info@pakistancables.com](mailto:info@pakistancables.com). In addition, at your request, via email, PCL will provide you a summary of the personal data it has regarding you. Should you wish to modify, correct, change or update any of the information, you should contact us at [info@pakistancables.com](mailto:info@pakistancables.com).

#### 4.10 How long we keep your Personal Data

We will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Policy, unless a longer retention period is required or permitted by applicable law.

#### 4.11 Severability

The invalidity or unenforceability of any provisions of this Privacy Policy in any country shall not affect the validity or enforceability of any other provision of this Privacy Policy, which shall remain in full force and effect.

#### 4.12 Modifications

PCL may modify its Privacy Policy to reflect changes in its practices. All changes will be posted on [www.pakistancables.com](http://www.pakistancables.com), and we will revise the effective date at the top of this Privacy Policy. We recommend that you check the Sites from time to time to inform yourself of any changes in this Privacy Policy or any of our other policies and to make sure we have your most up-to-date email address.



## 5. Implementation

- 5.1. The Policy to be uploaded on the Company website at <http://www.pakistancables.com> to ensure implementation.

## 6. Responsibilities

- 6.1. Executive Director  
6.2. Manager Marketing  
6.3. Manager IT

## 7. Definitions:

CNIC	Computerized National Identity Card
NTN	National Tax Number
IP Address	Internet Protocol Address
Site(s)	Websites including Company website ( <a href="http://www.pakistancables.com">www.pakistancables.com</a> ) and Company maintained social media pages on available social media platforms such as Facebook, Instagram, LinkedIn, Twitter.

Reviewed by:

**Fahd Kamal Chinoy**

Executive Director – Sales, Marketing, Materials and IT

Reviewed by:

**Kamal A. Chinoy**

Chief Executive