

Privacy Policy

Your privacy is important to us, and the Cactus Communications Group (“CACTUS,” “the Company,” “we,” “our,” or “us”) is committed to protecting your privacy whilst providing a personalized and valuable service.

Here at CACTUS, we are committed to safeguarding your data while rendering our professional services. Editage is a brand and division of CACTUS India that operates through various group entities including, but not limited to, entities located in Singapore, Japan, China, Korea, the United Kingdom, and the United States.

This Privacy Policy governs our data collection, processing, and usage practices. It is designed to allow the Data Subject (“you”) to make an informed choice regarding use, access, and correction of your Personal Information.

If you have any requests concerning your Personal Information or any queries about these practices, please contact us by e-mail on privacy@cactusglobal.com or you can contact us by writing to Cactus Communications Private Limited, 510, Shalimar Morya Park, Off Link Road, Andheri (West), Mumbai 400053, Maharashtra, India.

1. Personal Data That We Collect

We collect from you Personal Information such as full name, gender, date of birth, address, job title, company information, e-mail addresses, telephone numbers, identification details, and referral source, and if you are a Service Provider, we will also collect payment information (including bank, credit/debit card details, and electronic payment ids) billing address, and work and education profile. This data may include IP Address, operating system, and browser type. We may also have acquired your Personal Information from a third-party Service Provider or publicly available data source.

2. How We Use Your Personal Data

As Data Controller:

We use the information we collect only in compliance with this Privacy Policy. We will never sell your Personal Information to any third party without your explicit consent. In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information to (a) assist you with service, partnership, or employment request; (b) send to you information that we think may be of interest to you by post, email, or other means; (c) send you marketing communications relating to our business (including any profiling we engage in that is related to such direct marketing); (d) respond to an enquiry, question, or concern that you may have raised; or (e) perform analytics and create a database to improve your browsing experience and enhance the functionality of our services.

We may share Personal Information with trusted Service Providers or our group companies for payment processing, supplementing the information you provide us in order to provide you with better service, perform statistical analysis, provide marketing assistance, host the site and index user profile pages and usernames as part of the URL and customer support. Such third parties are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information. If you do not want us to share your Personal Information with these third parties, contact us at privacy@cactusglobal.com.

To facilitate our global operations, we may transfer and access Personal Information from around the world. This Privacy Policy shall apply even if we transfer Personal Information to countries outside the European Union.

After you place an order on our Website, you will need to make payment for the services you have ordered. In order to process your payment, we use a number of third-party payment processors. Your payment will be processed by the payment provider you choose to process your payment via a payment gateway.

If you give us banking, debit card, credit card, or other payment mode details, we solely use such details to process refund of payment to you. The third-party payment processors we use also collect, use, and process your information, including payment information, in accordance with their privacy policies.

To ensure that the security and integrity of the Site is safeguarded, CACTUS may monitor your Personal Information. CACTUS may under certain circumstances engage a trusted third-party Service Provider for the purpose of managing the technical operations involved in hosting the Site. **Information you submit to us via the contact form on our Website will be stored outside the European Economic Area on our third-party hosting provider's servers in Singapore.** To the extent that it may be necessary, and solely for the purposes of providing the service available on the Site to you, we may disclose to such third party any of your Personal Information that may be necessary for the procurement of services from the third party.

As Data Processor:

We shall use and process the information or data we collect through Data Controllers/Controllers ("Business Partner") as per the instructions given by Controllers and in compliance with the terms and conditions applicable to Processors under Controller/Processor Binding Agreement entered with the Controllers and applicable Regulation. We agree not to process such information to sub-processors (Sub-contractor), unless prior written consent is sought from the Controller, and in the event where general consent has been given by the Controller, we shall inform the Controller of any new sub-processor. We shall have the same contractual obligations reflected with the sub-processors as agreed with the Controller and assume complete responsibility for the actions and inactions of such sub-processors.

Upon written request from the Controller, we agree to delete or return all the Personal Information or data to the Controller after the end of the provision of services relating to processing, unless there is a legal obligation or basis for us to retain a copy of such information

or data for further processing. The information or data collected through the Controller will be stored outside the European Economic Area on our third-party hosting provider's servers.

In addition to implementation of appropriate technical and organizational measures to ensure an appropriate level of security, we shall make available to the Controller all information necessary to demonstrate compliance with our obligations, and allow the Controller or another auditor appointed by the Controller for conducting audits, including inspections, to demonstrate that processing meets the requirements of the Regulation, and ensure the protection of the rights of the data subject.

3. Children's Personal Information

CACTUS does not knowingly collect any Personal Information from children under the age of 18. If you are under the age of 18, please do not submit any Personal Information through our Websites or Service(s). We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through our Service(s) or Websites without their permission. If you have reason to believe that a child under the age of 18 has provided Personal Information to us through our Websites or Service(s), please contact us at privacy@cactusglobal.com, and we will endeavor to delete that information and terminate the child's account from our databases.

4. Retention of Personal Information

We retain Personal Information that you provide us as long as an Account is active or as needed to provide the Service(s) or as necessary to comply with our legal obligations, maintain accurate financial and other records, resolve disputes, and enforce our agreements. If you wish to terminate your Account or request that we no longer use Your Personal Information, please contact us at privacy@cactusglobal.com.

Criteria for determining retention periods

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;

- the levels of risk, cost, and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

5. Use of Cookies & Similar Technologies

Cookies are data files that are sent from a website to a browser to record information about users for various purposes.

We use cookies, including essential, functional, and analytical cookies. For further information on how we use cookies, please see our [\[cookies policy\]](#).

You can reject some or all of the cookies we use on or via our Website by changing your browser settings, but doing so can impair your ability to use our Website or some or all of its features. For further information about cookies, including how to change your browser settings and other ways in which you can reject cookies, please visit www.allaboutcookies.org or see our [\[cookies policy\]](#).

6. Social Media Features

Some of our Websites, namely, www.editage.com/insights, include social media features, such as Facebook, LinkedIn, Twitter, and Orcid, the “Share This” button, or interactive mini-programs. Where we have your consent, these features may collect your IP address and which page you are visiting on our Websites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Websites. Your interactions with these features are governed by the privacy policy of the company providing them.

7. Security of Your Personal Information

CACTUS has put in place the following security practices and procedures to protect your Personal Information from unauthorized access, use, or disclosure:

- a) We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure
- b) All our Information security processes are ISO/IEC 27001:2013 compliant.
- c) All our employees and Service Providers have signed confidentiality agreements where they have undertaken that they will not make any Personal Information available to anyone, unless authorized in writing by the user.
- d) Personal Information will not be made available to any third party, except as provided herein or by obtaining your prior written consent.
- e) All documents submitted are managed through a secure online job management system; the documents that are sent to us can only be viewed by service professionals working on your assignment.

f) **Payment-related Personal Information:**

- i. The Site uses Secure Socket Layer (SSL) encryption when accepting payment-related Personal Information, to ensure that your payment-related Personal Information is secure.
- ii. In order to protect your credit card information, all online transactions are conducted using a secure 256-bit SSL encryption signed by VeriSign. Encryption ensures that no information is accessible to unknown parties. CACTUS hereby undertakes not to store your credit card information, thereby reducing the possibility of fraudulent charges being made by CACTUS.

8. Hyperlinks

Our Company Websites contain links to other websites, including without limitation those websites of other companies within the CACTUS group. Their inclusion cannot be taken to imply any endorsement or validation by us of the content of the said websites. We are not responsible for the privacy practices nor do we accept any liability about the content of such websites including those of our group companies that have their own privacy policies tailored for the business practices and sectors in which they operate.

9. Testimonials & Public Forums

- 9.1. We post on our Websites customer testimonials/comments/reviews that may contain Personal Information. Prior to posting the testimonial, we obtain the customer's consent to post their name along with their testimonial. If you want your testimonial removed, please contact us at privacy@cactusglobal.com.
- 9.2. Our Websites offer publicly accessible blogs, community forums, or discussion board posts. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. You agree and acknowledge that the use of such information is not confidential, does not constitute Personal Information, and is not subject to protection under CACTUS's Privacy Policy.

10. Corporate Events

In the event CACTUS goes through a business transition, such as a merger or acquisition by another company, or sale of all or a portion of its assets, your user account and personal data will likely be among the assets transferred. You will be notified via a prominent notice of any such change in ownership or control. During such event, we may also disclose your Personal Information to any other third party with your prior consent.

11. Responsibility with You

When you submit any Personal Information to us, you represent that you have the lawful right to submit the Personal Information and agree that you will not submit any information unless you are legally entitled to do so and that such Personal Information is true, complete, and accurate. You may not use a false email address or other identifying information to impersonate any person or entity, or otherwise mislead as to the origin of any content. Any

improper collection or misuse of Personal Information is in violation of this Privacy Policy and of the applicable terms and conditions of use. You agree not to misuse any Personal Information available on our Site or to gather it or use robots or other automated scripts, codes, or functionalities to do so. We may immediately suspend or terminate your access to our Site without notice if we become aware that you are in breach of applicable terms and conditions of use or of this Privacy Policy.

12. Opting Out and Unsubscribing

12.1. Reviewing, Correcting, and Deletion of Your Personal Information

Upon request, CACTUS will provide you with information about whether we hold any of your Personal Information. We allow users of the Service(s) or Website to access, update, or modify their information by clicking on the My Account link in the CACTUS navigation menu. If you provide us with your Personal Information, you have the following rights with respect to that information:

- To review the user information that you have supplied to us
- To request that we correct any errors, outdated information, or omissions in user information that you have supplied to us
- To request that your user information not be used to contact you
- To request that your user information be deleted from our records
- To withdraw your consent to our use of your information; please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent

To exercise any of these rights and requests, please contact us at privacy@cactusglobal.com or by postal mail to Cactus Communications Private Limited, 510, Shalimar Morya Park, Off Link Road, Andheri West, Mumbai 400053, India, Attention: Privacy Team. We will respond to your request within reasonable timeframe and notify you of the action we have taken.

12.2. To Unsubscribe from Our Communications

Your registered email address will be automatically subscribed to our weekly newsletter, which will contain information on industry updates, author resources, upcoming webinars, latest offers, and new services by CACTUS. You may unsubscribe from our marketing communications by clicking on the “unsubscribe” link located on the bottom of our e-mails, or by sending us an email at privacy@cactusglobal.com. Customers cannot opt out of receiving transactional emails related to their account with us.

13. Sensitive Personal Information

What Is Sensitive Personal Information?

“Sensitive Personal Information” is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health, or information concerning a natural person’s sex life or sexual orientation.

We do not knowingly or intentionally collect sensitive Personal Information from individuals, and you must not submit sensitive Personal Information to us.

If, however, you inadvertently or unintentionally transmit sensitive Personal Information to us, you will be considered to have explicitly consented to us processing that sensitive Personal Information.

14. Amendments to Privacy Policy

We may update this Privacy Policy from time to time to keep up with changing legislation and best practices. If we make any material changes, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on the Website prior to the change becoming effective. Provided that we will not notify you if we amend the Policy to make addition, deletions, or modifications to the list of cookies from time to time, to keep the list of cookies current and accurate. Your continued use of this Websites or the Service(s) following the posting of any amendment, modification, or change to this Policy shall constitute your acceptance of the amendments to this Policy. You can choose to discontinue use of the Websites or Service(s) if you do not accept the terms of this Policy or any modified version of this Policy.

15. Legal Disclosure

We reserve the right to disclose your personal data as required by applicable law, in response to lawful requests by public authorities, including meeting national security or law enforcement requirements and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or other legal process served on us.

16. Contact Us

If you have any questions about this Privacy Policy or the data we hold about you or you wish to ensure that the data we hold about you is accurate and kept up to date, please do not hesitate to contact us at privacy@cactusglobal.com.

Effective Date: May 25, 2018