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Policy Name	Privacy Policy
Policy Ownership	IT Department
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# Privacy Policy of Pak Datacom Ltd.

This privacy policy outlines how we collect, use, and protect your information when you use our services.

You can contact us at [it@pakdatacom.com.pk](mailto:it@pakdatacom.com.pk).

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## Introduction

### What is this policy about?

This document explains how PDL collects, uses, and protects your data to achieve the purposes outlined in this document.

## Types of data collected

PDL does not explicitly collect customer private/personal data, through its website or any other electronic forum. During e-mail or telephonic communication however, or through our complaint management system, contact numbers and names may be obtained and retained e.g. This data may include, but is not limited to:

- first name;
- last name;
- email address;
- Landline/Mobile phone numbers
- Any pertinent information related to the client's business

Any use of cookies by this website or by the owners of third-party services used by this website serves the purpose of providing the service required by you, in addition to any other purposes described in the present document.

## Mode and place of processing data

### Methods of processing

We take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the data. The data processing is carried out using

computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated.

The data is accessible only to certain types of persons in charge, who are directly related/relevant e.g. administration, sales team, marketing team, legal team.

The data may also be accessible to external/3<sup>rd</sup> parties, as allowed/regulated by our agreements with our customers.

### **Place**

The data is processed at our operating offices and in any other places where the parties involved in the processing are located. Depending on your location, data transfers may involve transferring your data to a country other than your own. The data is largely processed digitally, and online, or through secured, encrypted 3<sup>rd</sup> party media.

### **Retention time**

Unless specified otherwise in this document, data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on your consent.

When/if we collect your information/data, we keep it for as long as required for the purposes we collected for. Sometimes, we might need to keep your personal information longer due to a legal obligation or based on your consent.

Here's what that means in more detail. We will keep your data/information based on the purposes and reasons set out below:

- **for contractual purposes:** If we have concluded a contract with you, then we'll keep your information until the contract has been performed in full.
- **for our legitimate interests:** If we're using your personal information for purposes that are necessary and relevant to our business operations, we'll keep it as long as we need it for those purposes. You can learn more about these purposes within the relevant sections of this document or by contacting us.
- **with your consent:** We may be allowed to retain personal data for a longer period whenever you have given consent to such processing, unless you withdraw your consent.
- **legal obligations:** we may be obliged to retain personal data for a longer period whenever required to fulfill a legal obligation or upon order of an authority.

Once the retention period expires, your data will be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

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## Legal basis of processing

We may process personal data relating to you if you have given your consent for one or more specific purposes:

- provision of data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which we are subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us;
- processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

In any case, we will gladly help to clarify the specific legal basis that applies to the processing, and whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

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## Your rights to your data:

You may exercise certain rights regarding your data processed by us. In particular, you have the right to do the following, to the extent permitted by law:

- **Withdraw your consent at any time.** You have the right to withdraw consent where they have previously given your consent to the processing of your personal data.
- **Object to processing of your data.** You have the right to object to the processing of your data if the processing is carried out on a legal basis other than consent.
  - If your data is processed for public interest, by an official authority, or for our legitimate business interests, you can object by providing a reason related to your particular situation.
  - However, if your data is being processed for direct marketing purposes, you can object at any time, free of charge, and without any reason. If you do, we will stop using your personal data for marketing. To find out if we are using your data for direct marketing, please refer to the relevant sections of this document.
- **Access your data.** You have the right to learn if data is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the data undergoing processing.
- **Verify and seek rectification.** You have the right to verify the accuracy of your data and ask for it to be updated or corrected.
- **Restrict the processing of your data.** You have the right to restrict the processing of your data. In this case, we will not process your data for any purpose other than storing it.
- **Have your data deleted or otherwise removed.** You have the right to obtain the erasure of your data from us.

- **Receive your data and have it transferred to another controller.** You have the right to receive your data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** You have the right to bring a claim before your competent data protection authority.
- **Learn about the reason for data transfers.** You are also entitled to learn about the legal basis for data transfers abroad, including to any international organization governed by public international law or set up by two or more countries, such as the UN.
- **Know about security measures:** You have the right to know about the security measures we take to safeguard your data.

## How to exercise these rights

Any requests to exercise your rights can be directed to us. Our full contact details can be found at the start of this document.

Such requests are free of charge and will be answered by us as early as possible, providing you with the information required by law.

Any rectification or erasure of data or restriction of processing will be communicated by us to each recipient, if any, to whom the personal data has been disclosed unless this proves impossible or involves disproportionate effort. At your request, we will inform you about those recipients.

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## Prompt responses

We will strive to promptly respond to your requests. In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

## How we secure our customers' data

Our customers' data's integrity and security is our top priority, always. Our customers' data is made secure by the elaborate confidentiality clauses in our SLAs and contracts with our customers, as well as with any 3<sup>rd</sup> party service providers involved.

For further details, please contact your KAM, or the appropriate PDL marketing personnel.

## **Additional information about data collection and processing**

### **Information not contained in this policy**

More details concerning the collection or processing of personal data may be requested from us at any time. Please see the contact information at the start of this document.

### **Changes to this privacy policy**

We reserve the right to make changes to this privacy policy at any time by notifying you on this page and possibly within this website and/or - as far as technically and legally feasible - sending a notice to you via any contact information available to us. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. Should the changes affect processing activities performed based on your consent, we shall collect new consent from you, where required.