

# GIA India Laboratory Private Limited Website Privacy Notice

Last Updated July 6, 2023, v. 4.0.

## 1. Introduction

GIA India Laboratory Private Limited (Laboratory) and our related entities (“GIA,” “GIA India Laboratory Private Limited,” “GIA Entities,” “we,” “us,” or “our”) respect your privacy. GIA India Laboratory Private Limited provides this website privacy notice (“Privacy Notice”) to describe how we collect, use, disclose, or otherwise process the data, including personal data, that we collect about you through our website, <https://www.giaindia.in/> and our other GIA websites on which this Privacy Notice is posted (collectively, the “Sites”), our mobile application(s) on which this Privacy Notice is posted (the “App(s)”), offline (such as at tradeshows or at GIA India Laboratory Private Limited locations), and the services available through our Sites, App, and offline (collectively, the Sites, the App, and GIA India Laboratory Private Limited services offered offline are referred to as our “Services”). We collect data directly from you, automatically as you use our Services, from vendors, and from other individuals, as set forth below.

GIA India Laboratory Private Limited is the Data Controller for data submitted through our Services at the addresses set forth below.

### **GIA India Laboratory Private Limited (Laboratory)**

10<sup>th</sup> Floor Trade Centre  
Bandra Kurla Complex  
Bandra (East)  
Mumbai  
Maharashtra 400 098  
India

Swastik Universal, 2<sup>nd</sup> and 3<sup>rd</sup> Floors  
F.P. No. 10/11, RS No. 15/1A  
Dumas Road  
Piplod, Surat  
Gujarat 395 007  
India

This Privacy Notice does not apply to information, data, or materials collected by third party websites, applications, or social or media platforms (“Platforms”). These Platforms have their own privacy and security practices for which GIA is not responsible. Your use of these Platforms is at your sole risk. If you use these Platforms to communicate with us, we will use the information we collect from you in accordance with this Privacy Notice.

Depending on your relationship with GIA, other privacy notices also may apply to you. For example, if you are accessing the Client Portal or My Laboratory as a client of GIA, then our collection of your personal data is governed by the Client Privacy Notice, not this Privacy Notice. If you are a student, then please review the Student Privacy Notice.

## 2. Information We Collect About You

We collect information, including personal data, about you directly from you, from vendors, other parties, and automatically through your use of our Services. We combine the information we collect from these various sources. The type of personal data that we collect from you varies based on your particular interaction with our Services as set out below.

- **Account and Registration:** Your full name, email address, home and mailing address, telephone number, mobile number, and, where applicable, payment information. You may also provide additional, required or voluntary information, where relevant. We also collect information in accordance with our Know Your Customer and Due Diligence Program.
- **Communications:** When you communicate with us, provide information through our surveys, in the context of a trade show, or otherwise, for example, if you participate in one of our seminars.
- **Request That Your Establishment Be Listed on GIA's Site:** Information about your store and business contact information for a representative of the store. (Note: in this context, someone other than you may provide us with your information if you are listed as the representative of that store).
- **Seek to Find a Store Near You:** Your location information (through the collection of your IP address) in order to locate a store near you.
- **Purchase Items From Our Store:** Your full name, contact information, items purchased, billing and shipping information, and payment data. You may also provide additional required or voluntary information, where relevant.
- **Your Usage of Our Services:** Your submission history, inquiries that you submit to us, records of purchases, and other interactions with us.
- **Applicant for Employment and Recruitment:** We collect information from or about you when registering with our job placement portal, including, but not limited to your full name, residential address, image, email ID or address, phone number, current employment details, work experience, current student status, alumnus status, whether you're a GIA student and GIA student ID as may be applicable. You may also provide additional, required or voluntary information, where relevant, including current or past employers name, contact person details, employers address, employers alias, affiliation, company category, company overview, company logo, industry, type of organization, number of employees, company website, videos and any attachments, as may be applicable.
- **At Trade Shows and Other Events:** We collect information from or about you at trade shows and other events, including at trade shows or other events that we may host or at booths that we may operate. We take photographs and film video at many of our events and use the photographs and videos to share information about our events on social media and other platforms and generally promote our products and services. Accordingly, when you attend our events, your likeness and image may be contained within these photos and videos.
- **Social Network Form Fill:** We may process your personal data when you authorize your social network to prefill a form on a Site (e.g., by signing into your social media account(s) through a button that appears on a Site). In that case, we will receive personal data about you from the social

network pursuant to the policies of that social network. Examples of the personal data that we may receive includes your display name, first name, last name, profile URL, profile photo URL, social reach (number of followers), gender, email, date of birth, job title, and company. Your personal data will be processed by us in accordance with this Privacy Notice.

- **User Content:** You may post to the blogs and forums available within our Services. Any information that you post to a publicly facing blog or forum may be viewable by any other visitor to our Sites or App. We are not responsible for the privacy of any information that you choose to post to our Sites or App, or for the accuracy of any information contained in those postings. We cannot prevent such information from being used in a manner that may violate this Privacy Notice, the law or your personal privacy.
- **Social Media:** The Services may allow you to connect to and share information with social media platforms and we may be required to implement cookies, plug-ins, and APIs provided by those social media platforms to facilitate those communications and features. We may share information that you provide us or that we may collect about your use of the Services with those platforms and that information will be subject to their privacy policies. We encourage you to review the privacy policy of any social media platform that you use in connection with the Site. In addition, by choosing to use any third-party social media platform or choosing to share content or communications with any social media platform, you allow us to share information with the designated social media platform. We cannot control any policies or terms of such third-party platforms. As a result, we cannot be responsible for any use or disclosure of your information or content by third party platforms, which you use at your own risk.

### 3. Information We Collect Automatically

- **Device and Online Usage:** We collect information about your computer, browser, mobile or other device that you use to access the Services. We may use cookies, pixels, log files and other techniques to collect such information, including IP address, device identifiers and other unique identifiers, browser type, browser language, operating system name and version, device name and model, version, referring and exit pages, dates and times you access our Services, the length of time that you are logged in to or using our Services, the links you click or features you use, software crash reports and session identification number. Please see the “Cookies and Other Tracking Technologies” section below.
- **Analytics:** Using service providers, we compile and analyze information derived from the use of our Services, such as aggregate usage patterns, user preferences, and other usage information.

Please see the “Cookies and Other Tracking Technologies” section below for additional information about our use of cookies.

### 4. Our Use of Your Information

We use your information, including your personal data, for the following purposes:

- **Providing and Improving Our Services:** To provide you with our Services, to improve our Services to enhance your experience using the Services, to respond to your inquiries, to develop new features,

products, or services; to authenticate you; to perform technical operations, such as updating software; as well as for other customer service and support purposes;

- **Marketing and Similar Communications:** For marketing and advertising purposes, such as, to the extent permitted by applicable law, to send you emails and SMS about products, services, and events that we believe would be of interest to you; to send our newsletter to you;
- **To Solicit Donations;**
- **Personalizing Content and Ads:** To assist us in determining relevant advertising (i) on our Sites and App; (ii) on non-GIA websites and mobile applications; and (iii) through other media;
- **Research and Analytics:** To better understand how users access and use our Services, both on an aggregated and on an individualized basis, including monitoring, evaluating, and analyzing which features and portions of our Site and our Apps are most popular, for troubleshooting, for statistical purposes including identifying geographic regions of visitors to our Services, evaluating frequently asked questions from visitors, and for other statistical purposes;
- **Applicant for Employment and Recruitment:** To assist us during the application, recruitment, interview and/or on-boarding process prior to employment, when you choose to apply for an open position at GIA.
- **Protecting Rights and Interests:** To protect the safety, rights, property, or security of GIA India Laboratory Private Limited, the Services, any service provider, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity that we consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; and to enforce this Privacy Notice or our [Terms of Use](#); and
- **Legal Compliance:** To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; to respond to a summons, warrant, court order, or other legal process; or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority.

GIA India Laboratory Private Limited may also enhance or merge your personal data with the data that we obtained from the analytics providers referenced above. We will use this information to assist us in our marketing efforts and for the purposes described in this Privacy Notice.

## 5. Disclosing Your Information

We will not disclose your personal data to non-GIA Entities for their own marketing purposes. We will, however, disclose your information, including personal data, to entities as described below:

- **GIA Entities:** We will share your information with GIA Entities, so that they may contact you about our Services (marketing) or respond to your customer service inquiries.
- **Service Providers:** We disclose your personal data to our service providers, contractors, professional advisors, agents, or others who perform functions on our behalf. These service providers include vendors who assist us with sending out email correspondence, SMS messages, payment processors,

and other providers consistent with completing your request to GIA India Laboratory Private Limited.

- **Social Networking Companies:** We disclose your email address to Facebook to assist us in determining relevant advertising on Facebook and through other media. See Online Advertising below.
- **Other Users:** As stated above, you may choose to submit information on a blog or in a forum. Any information that you submit will be available to other users of our Services.
- **General Business Operations:** We disclose personal data where necessary to the administration of our general business, accounting, record keeping and legal functions, to our tax advisors, legal counsel and other professional services entities or agents.
- **Business Transfers:** If we are acquired by or merge with another entity, if some or all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the acquiring entity. We also may transfer certain of your personal information to another company in the course of evaluating a prospective transfer, where permitted by law.
- **In Response to Legal Process:** We disclose your personal data to comply with the law, a judicial proceeding, court order or other legal process, such as in response to a summons or warrant.
- **To Protect Us and Others:** We disclose your information where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety rights, property, or security of GIA India Laboratory Private Limited, the Services, or of any person or violations of our Terms of Service or this Privacy Notice.
- **Other Third Parties:** We may share your information with other third parties as permitted by law, including for marketing purposes or to respond to your customer service inquiries.
- **Aggregate and Anonymized Information:** We may share aggregate or anonymized information about use of the Services with service providers for marketing, advertising, research, analytics or other similar purposes. We also may publish reports in the aggregate about usage trends of our Services.

Other than as described in this Privacy Notice, you will not be subject to decisions based on automated information processing without your prior consent.

## 6. Cookies and Other Tracking Technologies

We use cookies (including re-marketing cookies), web beacons (including clear GIFs), Flash Local Storage Objects (“Flash LSOs”) and similar technologies, including technologies designed for mobile applications, to track user activity and collect usage data about our Sites and App. We may combine this data with the personal data we have collected from you.

**Cookies.** Cookies allow a web server to transfer data to a computer for record keeping and other purposes. We and our service providers use “cookies” on our Sites and similar devices designed for mobile applications, to, among other things, better serve you with tailored information and facilitate

your ongoing access to and use of the Site. There are two types of cookies: session-based and persistent cookies.

- **Session Cookies.** Session cookies exist only during an online session. They disappear from your computer when you close your browser or turn off your computer. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged in to the Site (and the Apps). This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our Sites and App.
- **Persistent Cookies.** Persistent cookies remain on your computer after you have closed your browser or turned off your computer. We use persistent cookies to track aggregate and statistical information about user activity, which may be combined with other user information.

*Disabling Cookies.* Most web browsers automatically accept cookies, but if you prefer you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Visitors to our Sites who disable their web browsers' ability to accept cookies will be able to browse the Sites; however, certain site features, such as the shopping cart or the ability to find the location of a lab, may not function if you disable cookies.

**Local Storage Objects.** We may use Flash LSOs in order to store your Site preferences and to support individual applications. Flash LSOs are different from browser cookies because of the amount and type of data stored. In addition, you cannot control, delete or disable the acceptance of Flash LSOs through your browser. For more information on Flash LSOs, or to learn how to manage your settings for Flash cookies, go to the Adobe Flash Player Help Page, choose "Global Storage Settings Panel" and follow the instructions. To see the Flash LSOs currently on your computer, choose "Website Storage Settings Panel" and follow the instructions to review and, if you choose, to delete any specific Flash LSO.

**Web Beacons, Pixel Tags and Other Technologies.** Our service providers use web beacons in HTML emails to our customers, to help us track email response rates, measure the success of our marketing campaigns, identify when our emails are viewed and track whether our emails are forwarded.

**Analytics.** We work with service providers (including Google Analytics and Flurry) who conduct analytics to help us track and understand how visitors use our Sites and our App. If you prefer not to participate in Flurry, please follow the instructions provided at <https://www.flurry.com/>. Google Analytics is a web analytics service provided by Google that uses cookies to help us analyze how users use our Sites and our App. The information generated by the cookies about your use of the services will be transmitted to and stored by Google on servers in the United States. If you access the Sites or our App through different devices, Google may associate your devices with one another. For more information about how Google Analytics uses cookies to measure user interactions, visit <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>. Google has developed the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js). You can prevent Google's collection and use of the data it collects as defined in its policy by downloading and installing this browser plug-in: <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. For more information about Google Analytics

cookies, please see Google’s help pages (<https://support.google.com/analytics/answer/6004245>), [FAQ on how they use the data \(https://policies.google.com/technologies/partner-sites\)](https://policies.google.com/technologies/partner-sites), and [privacy policy \(https://policies.google.com/privacy?hl=en\)](https://policies.google.com/privacy?hl=en).

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <https://www.aboutcookies.org/> or <https://allaboutcookies.org/>.

**Google Maps.** Our Sites may include Google Maps features and content. Google Maps features and content is subject to the then-current versions of Google Maps/Google Earth Additional Terms [https://maps.google.com/help/terms\\_maps/](https://maps.google.com/help/terms_maps/) and Google Privacy Policy at <https://policies.google.com/privacy>.

**YouTube.** Our Sites may use YouTube to make content in video format available to you. By accessing a part of the Sites where videos are available, watching an embedded video, or otherwise interacting with any content made available through YouTube, you signify your agreement with YouTube’s terms and conditions. YouTube collects and otherwise has access to usage data (e.g., what videos you accessed and watched) through videos embedded in the Services as further described in YouTube’s Privacy Policy. YouTube adheres to Google’s privacy policies and principles, part of which allow you to control certain privacy settings and which data are collected. For more information, please visit <https://www.youtube.com/howyoutubeworks/user-settings/privacy/>.

## 7. Online Advertising

To display more relevant advertising on our Services, to manage our advertising on non-affiliated sites, mobile apps, and online services, and to measure and improve our ads and marketing efforts, we work with Facebook, Google and other non-affiliated ad companies, ad exchanges, channel partners, measurement services and ad networks. Please see the “Cookies and Other Tracking Technologies” section above for more information. For more information and to exercise your choices please see Facebook’s privacy policy and ad preferences page and/or Google/DoubleClick’s privacy policy, ad settings, and ads help page.

You can also learn more about online advertising here and opt out of interest-based advertising from many participating ad companies at the ad industry websites, including:

- EU: <https://www.youronlinechoices.eu/>
- U.S.: <https://youradchoices.com/>

Similarly, you can learn about your options to opt out of mobile app tracking by certain advertising networks through your device settings. For more information about how to change these settings for Apple, Android or Windows devices, see:

- Apple: <https://support.apple.com/en-us/HT202074>
- Android: <https://policies.google.com/technologies/ads>
- Windows: <https://account.microsoft.com/privacy/ad-settings/signedout?ru=https%3A%2F%2Faccount.microsoft.com%2Fprivacy%2Fad-settings>

Please note that opting out of advertising network services does not mean that you will not receive any advertising while using our Services or other services, nor will it prevent the receipt of interest-based advertising from non-affiliated parties that do not participate in these programs.

**Facebook.** For certain Facebook advertising services, Facebook Ireland is a Joint Controller (as defined in the GDPR) and that information required under the GDPR related to such processing can be found at [https://www.facebook.com/privacy/policy/?entry\\_point=data\\_policy\\_redirect&entry=0](https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0). We work with Facebook and use their advertising services to measure and improve our ads and marketing efforts, as well as to display more relevant advertising to you. For further information on how Facebook Ireland processes your personal information, including the legal basis, and the ways to exercise your rights, please visit [https://www.facebook.com/privacy/policy/?entry\\_point=data\\_policy\\_redirect&entry=0](https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0).

**Custom Audiences and Matching.** We may disclose certain information (such as your email address) with non-affiliated parties such as Facebook (more information on Facebook Custom Audience here or see above) so that we can better target ads and content to you, and others with similar interests on these non-affiliated parties' platforms or networks ("Custom Audiences"). We may also work with ad networks and marketing platforms that enable us and other participants to target ads to Custom Audiences submitted by us and others. To opt out of being included in our Custom Audiences going forward, email us at [indiaprivacy@gia.edu](mailto:indiaprivacy@gia.edu).

**"Do Not Track.** Your browser or device may include "Do Not Track" settings or functionality. Currently, our systems do not recognize browser "Do Not Track" requests. However, you may disable certain tracking on our Sites, as discussed above (e.g., by disabling cookies), and you may opt out of certain ad networks as described in this Privacy Notice. For more information about Do Not Track signals, please click here.

## 8. Marketing Choices

To the extent permitted by applicable law, we periodically send you electronic communications about our various products, services, or newsletters via email or in selected markets also via SMS. You may opt out of the receipt of marketing communications by clicking the "unsubscribe" options, by sending an opt-out request to [indiaprivacy@gia.edu](mailto:indiaprivacy@gia.edu), or where applicable, texting us STOP at the number you received the SMS. If you opt out of receiving marketing communications from us, please note that we may still send you email regarding your account, or for any Services you have requested or received from us (e.g., to notify you about the status of a purchase that you have made with us).

## 9. Links

For your convenience, we may provide links to certain non-affiliated websites or referrals to certain non-GIA India Laboratory Private Limited products or services. If you choose to visit these websites or to use such products or services, please be aware that the third party's privacy policy, and not this Privacy Notice, will govern your activities and any information you disclose while interacting with these limited websites. We are not responsible for the information practices of such non-affiliated websites or applications.



## **10. Security**

We have taken steps to help protect the personal data we collect. However, no data security measures can guarantee 100% security. You should take steps to protect against unauthorized access to your device and account by, among other things, choosing a robust password that nobody else knows or can easily guess and keeping your login and password private.

## **11. Job Applicants**

You may apply for employment at GIA India Laboratory Private Limited online. If you submit an application for employment online, we request information such as contact information, nationality (i.e., resident/non-resident of India, country, references, languages spoken, skills, prior work experience, and resume. Your submission of a resume, job application, or related information does not in any way require us to review that information or consider you for employment. The information you provide will be used for purposes of processing your employment application, for any legally-required purposes (including to protect our rights and interest and the rights and interests of others), and as described during the application process and on GIA's websites.

## **12. Transfer of Your Personal Data**

Depending upon your particular interaction with us, your personal data may be transferred, accessed, stored and otherwise processed by us, other third parties, or service providers for the purposes described above, and subject to requests from law enforcement (including courts and tribunals in accordance with laws applicable in those jurisdictions), in jurisdictions outside of your home jurisdiction, including the United States and India, and may not provide an equivalent level of data protection as your home jurisdiction. GIA India Laboratory Private Limited take steps to protect personal data, including, where required by law, through appropriate written data processing terms and/or data transfer agreements, for example, by signing relevant EU standard contractual clauses as approved by the European Commission (the form for these clauses can be found [here](#)). Subject to applicable law, you have the right to obtain details about the mechanism under which your personal data is transferred cross-border. For more information about these transfer mechanisms, please contact us as set out in the "Contact" section below.

## **13. Changes to This Privacy Notice**

GIA India Laboratory Private Limited reserves the right to modify this **Privacy** Notice as it deems appropriate from time to time. If we make a material change to the Privacy Notice, you will be provided with appropriate notice, in accordance with applicable legal requirements, for example via email or prominent notice on our Sites. You may find the most current version of the Privacy Notice by visiting the Sites. Your continued use of our Sites will be subject to the then-current Privacy Notice.

## **14. Contact**

If you would like to contact us regarding our privacy practices or to exercise your rights, please contact us at:

**GIA India Laboratory Private Limited (Laboratory)**

10<sup>th</sup> Floor, Trade Centre

Bandra Kurla Complex, Bandra East

Mumbai, 400 098 India

Swastik Universal, 2nd, 3rd & 4th Floors

F.P. No. 10/11, RS No. 15/1A, 9/2

Dumas Road

Piplod, Surat

Gujarat 395 007

India

or via email at [indiaprivacy@gia.edu](mailto:indiaprivacy@gia.edu)