

Satwic Privacy Policy

"Safeguarding Your Personal Information with Transparency and Trust"



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September 2026

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1. Purpose

Satwic Inc. is an IT services and consulting company committed to safeguarding your personal information. This Privacy Policy explains how we collect, use, disclose, and protect your personal data in connection with our services, websites, platforms, and communications.

2. Information We Collect

Personal Data:

We may collect the following personal information:

- Contact information (name, email, phone number, address)
- Employment information (job title, company name, responsibilities)
- Demographic data (age, gender, preferences)
- Communication preferences
- Unique identifiers (customer IDs, transaction IDs)

Technical and Usage Data:

Automatically collected data includes:

- IP address and device identifiers
- Browser type, operating system, and language
- Access times, clickstream data, page visits, time spent
- Location data
- URLs and referral information
- Cookies and tracking technologies
- Mobile device identifiers and push notification tokens

Cookie and Tracking Technology Disclosures:

We use the following categories of cookies and tracking technologies:

- o **Essential cookies:** Required for website functionality (strictly necessary)
- o **Analytics cookies:** Help us understand user behavior and improve performance (Google Analytics)
- o **Marketing cookies:** Enable personalized advertising and campaign

measurement (third-party ad networks)

- o **Social media cookies:** Facilitate social sharing and engagement

You can control cookie preferences through your browser settings or our cookie preference center. For EU residents, we obtain explicit consent before placing non-essential cookies.

3. Use of Personal Data

We use personal data to:

- Provide and manage our services
- Improve website performance and user experience
- Communicate with you about services, updates, and promotions, only with your consent or as legally required
- Ensure compliance with legal obligations
- Detect and prevent fraudulent or harmful activity
- Analyze service usage and effectiveness of campaigns
- Customize content and recommendations based on lawful basis and user preferences
- Comply with regulatory requirements and respond to lawful requests
- Conduct privacy impact assessments and data protection activities.

Lawful Basis for Processing:

Under GDPR and CCPA/CPRA, we process personal data based on the following lawful bases:

- o **Contract:** Data processing necessary to provide services you've requested
- o **Consent:** We obtain your express consent before processing sensitive personal information
- o **Legal Obligation:** We comply with applicable laws and regulations
- o **Legitimate Interests:** We process data to improve services, prevent fraud, and ensure security
- o **Vital Interests:** We process data to protect health and safety in emergency situations

4. Sharing of Personal Data

We may share your personal data:

- With affiliates or subsidiaries under our control, subject to equivalent privacy

protections

- With data processors and service providers under Data Processing Agreements that require equivalent data protection standards
- During business transfers (e.g., mergers, acquisitions), with notification to affected individuals
- With other users only if you share information publicly and with your explicit consent
- As required by law, regulatory bodies, or court orders, with notice to the data subject where legally permissible
- With your consent

Data Processing Agreements:

Satwic Inc. requires all service providers and data processors to execute Data Processing Agreements that:

- Limit use of personal data to authorized purposes
- Require industry-standard security measures
- Prohibit unauthorized disclosure
- Allow audits and inspections
- Include data breach notification requirements

5. Retention of Data

We retain personal data according to the following schedule:

- o **Customer contact information:** Retained for the duration of the customer relationship plus 7 years for tax/legal compliance
- o **Service usage data:** Retained for 12 months for service improvement and legal compliance
- o **Technical and access logs:** Retained for 90 days for security purposes
- o **Marketing communications data:** Retained until you unsubscribe, then 30 days
- o **Sensitive personal information:** Retained only as long as necessary for the stated purpose, minimum 30 days before deletion
- o **Transaction records:** Retained for 7 years to comply with financial regulations

Upon expiration of the retention period, personal data is securely deleted or anonymized.

6. Data Security

We employ comprehensive administrative, technical, and physical security measures to protect your personal data.

Technical Safeguards:

- o **Encryption:** Data at rest is protected with AES-256 encryption; data in transit is protected with TLS 1.2 or higher
- o **Access Controls:** Role-based access control (RBAC) limits data access to authorized personnel
- o **Audit Logging:** All access to personal data is logged and monitored for suspicious activity
- o **Multi-Factor Authentication (MFA):** Required for all employee access to systems containing personal data

Administrative Safeguards:

- Data Protection Impact Assessments (DPIAs) conducted for high-risk processing
- Privacy training required for all employees with data access
- Privacy by Design principles integrated into new systems and processes
- Security patch management and regular system updates

Physical Safeguards:

- Restricted facility access with badge/biometric authentication
- Surveillance systems and security personnel
- Secure storage of physical documents containing personal data.

Data Breach Response and Notification:

In the event of a confirmed or suspected data breach, Satwic Inc. will:

- Investigate the breach within 24 hours of discovery
- Notify affected individuals without undue delay (California requires the "most expedient time"; GDPR within 72 hours)
- Notify regulatory authorities where legally required (GDPR, state AG offices)
- Maintain a breach register documenting all incidents, impact assessments, and remedial actions
- Provide credit monitoring or identity theft protection services if personal financial

information was disclosed

7. Data Transfers and International Compliance

Your information may be transferred to, stored, or processed in countries outside of your own. Satwic Inc. ensures that such transfers are safeguarded in accordance with applicable data protection laws.

International Data Transfer Safeguards:

For transfers involving EU residents' data (GDPR compliance):

- We rely on Standard Contractual Clauses (SCCs) as the legal mechanism for transfers to non-adequate countries
- We conduct Transfer Impact Assessments to evaluate third-country data protection laws
- We implement supplementary safeguards where necessary to ensure an appropriate level of protection

For transfers to countries with adequacy decisions (e.g., UK, Canada), data transfers are permitted based on regulatory recognition. Transfers do not occur to countries lacking adequate data protection frameworks without explicit user consent.

8. Consumer Rights and Data Subject Requests

Depending on your location, you may have the following rights regarding your personal data:

California Residents (CPPA/CPRA):

- o **Right to Know:** Request what personal information we collect, use, and share
- o **Right to Delete:** Request deletion of personal information collected from you
- o **Right to Correct:** Request correction of inaccurate personal information
- o **Right to Opt-Out:** Opt out of the sale or sharing of personal information for targeted advertising
- o **Right to Limit:** Limit our use of sensitive personal information to necessary services
- o **Right to Non-Discrimination:** You will not be discriminated against for exercising CPPA rights

EU/EEA Residents (GDPR)

- o **Right to Access:** Obtain a copy of the personal data we hold about you
- o **Right to Rectification:** Correct inaccurate or incomplete personal data

- o **Right to Erasure ("Right to be Forgotten"):** Request deletion of personal data under certain circumstances
- o **Right to Restrict Processing:** Limit how we process your personal data
- o **Right to Data Portability:** Receive your personal data in a portable format and transmit it to another controller
- o **Right to Object:** Object to certain types of processing, including direct marketing
- o **Right to Withdraw Consent:** Withdraw previously given consent at any time

9. California Privacy Rights

Under California's Shine the Light law (Cal. Civ. Code §1798.83), California residents may request details once a year about how their data is shared for marketing purposes.

Under California Business and Professions Code Section 22581, California residents under age 18 can request removal of posted content by contacting us with their account details. We will review requests and remove content or make it unavailable within 30 days where legally permissible.

CPRA Sensitive Personal Information Protection:

Satwic Inc. limits collection and use of sensitive personal information (SPI) to purposes directly necessary to provide requested services. SPI includes Social Security numbers, financial account information, health data, biometric data, and racial or ethnic origin. We do not sell or share SPI without explicit consumer opt-in consent.

10. External Links

Our websites may link to external sites. We are not responsible for the privacy practices or content of third-party sites. We encourage you to review the privacy policies of any external websites before providing personal information.

11. Changes to This Policy

We may revise this Privacy Policy from time to time. Material changes will be communicated to affected individuals via email or service notice at least 30 days before implementation. Minor updates may be posted to our website without prior notice. Your continued use of our services following notification of changes constitutes your acceptance of the updated Privacy Policy.

12. Contact Us

To ask questions or exercise your rights (including data access, correction, deletion, or opting out of communications), please contact us at : info@satwic.com