

Privacy Policy

This Privacy Policy is effective 1st of September 2020.

This Digital Privacy Policy ("Privacy Policy") describes how MAS Innovation (Private) Limited a company duly incorporated under the laws of Sri Lanka having its registered address at 10th Floor, Aitken Spence Tower II, 315, Vauxhall Street, Colombo 02, Sri Lanka ("we" or "us" or "our") collects, uses and discloses your personal data through a variety of digital means: when you are accessing or using this website or mobile application (the "Platform") on any computer, mobile phone, tablet, console or other device (collectively, "Device"). We may modify this Privacy Policy at any time effective upon its posting.

For European Economic Area ("EEA") data subjects: We are required to set out the legal basis for collecting, using, disclosing, transferring or processing your personal data. We have identified that legal basis in this Privacy Policy. For EEA data subjects, we have also explained where appropriate the tests we have applied in assessing that legal basis (such as a "balancing test"). More information on the balancing test is available upon request. The end of this Privacy Policy contains further content specific to EEA data subjects.

1. WHAT PERSONAL DATA WE COLLECT AND WHY AND LEGAL BASIS

We collect personal data in the following ways:

a. Active collection

Active collection means personal data you provide to us when you contact us or request for further information from us. We may ask you to provide us with your name, your surname, your company name, your email address, contact number and other limited amounts of personal data. We process such personal data for the purpose of providing our services to you, to connect you with our trading/manufacturing entities, and to communicate with you regarding the services. Providing such personal data is voluntary. However, without providing such personal data, we will not be able to process your request for further information or any other request. We will further use this personal data to optimize our products, learn more about our potential customers/collaborators, including to build a database of interested consumers /collaborators.

We do not collect any credit card or other payment card data from you via the Platform. For the avoidance of any doubt, no financial transaction shall take place via this Platform.

For EEA data subjects: The legal basis for the processing of the above personal data relating to active collection in some cases will be the contract on the use of the Platform concluded with you. The legal basis for the processing of the above personal data in some cases will be our legitimate interest, which is the use of personal data to connect you with our trading/manufacturing entities, develop our products and our business. We have assessed in a balancing test that the processing is necessary to achieve our aforementioned legitimate interests and that our legitimate interests are not overridden by your interests or your fundamental rights and freedoms.

We will also use your personal data to send you email and other marketing messages about our products. The personal data we collect allows us to keep you posted on our latest product announcements. If the law requires us to do so, we will first seek your consent before sending you marketing messages.

For EEA data subjects: We will only send you marketing messages when you have consented to receive them. The legal basis for the processing of such personal data is consent.

b. Passive collection

Passive collection means: information, which may include personal data, which is automatically collected as you navigate through and interact with the content on the Platform, as well as install information on your Device (such as cookies).

The purpose of passively collecting your information is to understand the visitors' behavior and engagement to different areas of the Platform, along with to improve the overall customer experience.

Through the tracking code embedded in our Platform, the information, which may include personal data, collected includes:

i. Device-specific data

The following information may be collected through your Device and browser:

- your Device's IP address (collected and stored in an anonymized format);
- device screen size;
- device type (unique device identifiers) and browser information;
- geographic location (country location only);
- preferred language used to display the webpage.

ii. Log data

Our servers automatically record information that includes:

- referring domain;
- pages visited;
- geographic location;
- preferred language used to display the webpage;
- date and time when Platform pages were accessed.

ii. Cookies

We do not currently respond to "do not track" signals in browsers; we are trying to provide a customized experience. The Platform uses "cookies" to collect information, which may include personal data including standard internet log information and details of your behavioral patterns upon visiting our Platform. We do this to provide you with a better experience, identify preferences, diagnose technical problems, analyze trends and to improve the Platform. "Cookies" are small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the Platform.

For EEA data subjects: The legal basis for the automatic collection of personal data listed above are our legitimate interests which are the following: to monitor and maintain the performance of the Platform and to analyze trends, usage and activities in connection with our Platform, to provide a better experience for you, to identify preferences, to diagnose technical problems and to analyze trends and to improve the Platform. We have assessed in a balancing test that the processing is necessary to achieve our aforementioned legitimate interests and that our legitimate interests are not overridden by your interests or your fundamental rights and freedoms. Providing such personal data is voluntary.

The Platform also uses cookies to collect information to be used for targeted marketing purposes and/or tracking purposes. If the law requires us to do so, we will first seek your consent before using cookies in this way.

For EEA data subjects: We will only use cookies in this way with your consent. The legal basis for such processing is your consent.

iv. Third Party Services

We use a variety of services hosted by third parties such as Google Analytics. The following table lists the cookies that we use on our Platform:

Name	File(s)	Lifespan	Explanation	Opt out	Cookie Type	Recipient and appropriate safeguards
Google Analytics – Classic Analytics	__utma __utmb __utmc __utmt __utmz __unam	2 years from set/update 10 minutes 30 mins from set/update End of browser session 6 months from set/update 2 years from set/update	This website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies, which are text files placed on the user’s computer, to help the website analyze how users use the site. The information generated by the cookie about the use of the website by the users will generally be transferred to and stored by Google on servers in the United States. This website has activated the IP-address anonymization functionality so that the IP-address of the user located within the member states of the EU or the EEA are shortened by Google prior to such a transfer.	You may further opt-out of the collection of your data (including your IP-address) generated by the Cookie and relating to your usage of the website and the processing of the data by Google by downloading and installing the add-on for your current web browser from the following link: http://tools.google.com/dlpage/gaoptout?hl=de	first party cookie functionality cookies, targeting or advertising cookies	EU Privacy Shield The U.S. Department of Commerce has approved Google's certification to the Privacy Shield as fully compliant. View our Privacy Shield certification. ISO 27001 Google has earned ISO 27001 certification for the systems, applications, people, technology, processes, and data centers serving a number of Google products, including Google Analytics. Download our certificate here (PDF) or learn more about ISO 27001. Information security In web-based computing, security of both data and applications is critical. Google dedicates significant resources towards securing applications and data handling to prevent unauthorized access to data. Data is stored in an encoded format optimized for performance, rather than stored in a traditional file

		<p>In exceptional cases only, the full IP-address may be transferred to the servers of Google in the USA to be shortened there. Google will process this information on our behalf for purposes of analyzing the usage of the website by the users, compiling reports on website activities and providing other services relating to the usage of the website and the internet vis-à-vis the website operator. Google will not link your IP address which is transferred by your browser via Google Analytics with any other data held by Google.</p> <p>You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You may further opt-out of the collection of your data (including your IP-address) generated by the</p>		<p>system or database manner. Data is dispersed across a number of physical and logical volumes for redundancy and expedient access, thereby obfuscating it from tampering.</p> <p>Google applications run in a multi-tenant, distributed environment. Rather than segregating each customer's data onto a single machine or set of machines, data from all Google users (consumers, business, and even Google's own data) is distributed among a shared infrastructure composed of Google's many homogeneous machines and located in Google's data centers.</p> <p>In addition, Google Analytics ensures secure transmission of its JavaScript libraries and measurement data. Google Analytics by default uses HTTP Strict Transport Security (HSTS), which instructs browsers that support HTTP over SSL (HTTPS) to use that encryption protocol for all communication between end users, websites, and Google Analytics servers.</p> <p>https://support.google.com/analytics/answer/6004245</p>
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			<p>Cookie and relating to your usage of the website and the processing of the data by Google by downloading and installing the add-on for your current web browser from the following link: http://tools.google.com/dlpage/gaoptout?hl=de</p>			
<p>Google Analytics - Universal Analytics</p>	<p>_ga</p>	<p>2 years from set/update</p>	<p>This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies, which are text files placed on the user's computer, to help the website analyze how users use the site. The information generated by the cookie about the use of the website by the users will generally be transferred to and stored by Google on servers in the United States. This website has activated the IP-address anonymization functionality so that the IP-address of the user located within the member states of the EU or the EEA are</p>	<p>You may further opt-out of the collection of your data (including your IP-address) generated by the Cookie and relating to your usage of the website and the processing of the data by Google by downloading and installing the add-on for your current web browser from the following link: http://tools.google.com/dlpage/gaoptout?hl=de</p>	<p>first party cookie</p>	<p>EU Privacy Shield</p> <p>The U.S. Department of Commerce has approved Google's certification to the Privacy Shield as fully compliant. View our Privacy Shield certification.</p> <p>ISO 27001</p> <p>Google has earned ISO 27001 certification for the systems, applications, people, technology, processes, and data centers serving a number of Google products, including Google Analytics. Download our certificate here (PDF) or learn more about ISO 27001.</p> <p>Information security</p> <p>In web-based computing, security of both data and applications is critical. Google dedicates significant resources towards securing applications and data handling to prevent unauthorized access to data.</p>

		<p>shortened by Google prior to such a transfer.</p> <p>In exceptional cases only, the full IP-address may be transferred to the servers of Google in the USA to be shortened there. Google will process this information on our behalf for purposes of analyzing the usage of the website by the users, compiling reports on website activities and providing other services relating to the usage of the website and the internet vis-à-vis the website operator. Google will not link your IP address which is transferred by your browser via Google Analytics with any other data held by Google.</p> <p>You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You may further opt-out of the</p>		<p>Data is stored in an encoded format optimized for performance, rather than stored in a traditional file system or database manner. Data is dispersed across a number of physical and logical volumes for redundancy and expedient access, thereby obfuscating it from tampering.</p> <p>Google applications run in a multi-tenant, distributed environment. Rather than segregating each customer's data onto a single machine or set of machines, data from all Google users (consumers, business, and even Google's own data) is distributed among a shared infrastructure composed of Google's many homogeneous machines and located in Google's data centers.</p> <p>In addition, Google Analytics ensures secure transmission of its JavaScript libraries and measurement data. Google Analytics by default uses HTTP Strict Transport Security (HSTS), which instructs browsers that support HTTP over SSL (HTTPS) to use that encryption protocol for all communication between end users, websites, and Google Analytics servers.</p> <p>https://support.google.com/analytics/answer/6004245</p>
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			<p>collection of your data (including your IP-address) generated by the Cookie and relating to your usage of the website and the processing of the data by Google by downloading and installing the add-on for your current web browser from the following link:</p> <p>http://tools.google.com/dlpage/gaoptout?hl=de</p>			
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2. WHAT WE COLLECT FROM OTHER INTERACTIONS WE HAVE WITH YOU AND FROM THIRD PARTIES

To the extent you have consented to us doing so, we may combine personal data you give us with other personal data we hold about you from digital/other sources, transactions and communications. This may include personal data obtained from social media platforms, our stores, direct mail, catalogs, events, products and applications, or other interactions. To the extent you have consented, we may also combine that personal data with data that is publicly available and data from third parties.

For EEA data subjects: The legal basis for the combination of such personal data is your consent.

3. SHARING PERSONAL DATA

a. CORPORATE GROUP

We may provide your personal data to our holding company and affiliates, some of which may be outside the European Union. The access is limited to colleagues with a need to know.

For EEA data subjects: The legal basis for the respective transfer of your personal data is our legitimate interests. Our legitimate interests are the transmission of personal data within the group of companies to connect you with our trading/manufacturing entities and for internal administrative and support purposes. We have assessed in a balancing test that the processing is necessary to achieve our aforementioned legitimate interests and that our legitimate interests are not overridden by your interests or your fundamental rights and freedoms.

b. SERVICE PROVIDERS

We may transfer your personal data to service providers to conduct our business. For example, they may handle data management, email distribution, market research, information analysis, and promotions management, acting as data processor. We may also share your personal data to administer features (e.g. to provide user focused services, to e-commerce services in future). Those external service providers

will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard your personal data and to process the personal data only as instructed.

BY LAW OR TO PROTECT RIGHTS

To the extent permitted or required by applicable law we may disclose personal data upon governmental request, in response to a court order, when required by law, to enforce our policies, or to protect our or others' rights, property or safety. To the extent permitted by law we may share personal data to prevent illegal uses of our products and services or violations of the Terms of Use, or to defend ourselves against third-party claims. We may also share personal data with companies assisting in fraud protection or investigation.

For EEA data subjects: The legal basis for such processing is compliance with a legal obligation to which we are subject or our legitimate interests, such as exercise or defense of legal claims. We have assessed in a balancing test that the processing is necessary to achieve our aforementioned legitimate interests and that our legitimate interests are not overridden by your interests or your fundamental rights and freedoms.

c. BUSINESS TRANSFERS

Your personal data may be transferred to a third party as a part of our business assets in a sale of a part or all of our business. If this should happen, notice of the transfer will be provided by posting to the Platform or other form of communication.

For EEA data subjects: The legal basis for the transfer may be your consent, the performance of a contract, the pursuit of legitimate interests, or other applicable legal bases.

4. SHARING - YOU CHOOSE

You may choose to share certain personal data. In order to participate in certain features, you may have to adjust your privacy settings and share more personal data. You may also choose to share your activity on other platforms, such as Facebook and Twitter. Please read the privacy policies of those platforms, because your activity published on those platforms will no longer be governed by this Privacy Policy.

For EEA data subjects: The legal basis for sharing this personal data is your consent.

5. PROTECTING THE PERSONAL DATA

Security Measures: We use a variety of security measures, including encryption and authentication tools, to help protect your personal data.

6. CONTACT US

If you have concerns or questions regarding this Privacy Policy, please contact us as follows:

MAS Innovation (Private) Limited

Name: Amaar Esufally

Email: Amaare@masholdings.com

Address: 50, Foster Lane, Colombo 10, Sri Lanka

For EEA data subjects: The contact details of our representative are as follows:

Name: Amaar Esufally

Email: Amaare@masholdings.com

Address: 50, Foster Lane, Colombo 10, Sri Lanka

GENERAL DATA PROTECTION REGULATION DISCLOSURES FOR EEA DATA SUBJECTS

The below sections set out rights and other matters specific to EEA data subjects.

6. INTERNATIONAL DATA TRANSFER

The personal data that we collect or receive about you may be transferred to and processed by recipients who are located inside or outside the European Economic Area and which do not provide for an adequate level of data protection. The countries that are recognized to provide for an adequate level of data protection from an EU law perspective are Andorra, Argentina, Canada, Switzerland, Faeroe Islands, Guernsey, the State of Israel, Isle of Man, Jersey, New Zealand and the Eastern Republic of Uruguay. Recipients in the US may partially be certified under the EU-U.S. Privacy Shield and thereby deemed to provide for an adequate level of data protection from an EU law perspective. To the extent your personal data is transferred to countries that do not provide for an adequate level of data protection from an EU law perspective, we will base the respective transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission. You can ask for a copy of such appropriate safeguards by contacting us as set out in Section "CONTACT US". The access is limited to recipients with a need to know.

7. KEEPING YOUR PERSONAL DATA

Please do contact us in the event you wish to modify or delete your profile within certain of our services. Your information previously posted may still be publicly viewable. We may keep information and content in our backup files and archives. Your personal data will be retained as long as necessary to provide you with the services requested. When we no longer needs to use your personal data to comply with contractual or statutory obligations, we will remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it, unless we need to keep your personal data, including if we need to keep your personal data to comply with legal or regulatory obligations to which we are subject, e.g. statutory retention periods and usually contain retention periods, or if we need it to preserve evidence within the statutes of limitation.

8. YOUR RIGHTS

If you have declared your consent for any personal data processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

Pursuant to applicable data protection law you may have the right to: request access to your personal data, request rectification of your personal data; request erasure of your personal data, request restriction of processing of your personal data; request data portability, and object to the processing of your personal data. Please note that these aforementioned rights might be limited under the applicable national data protection law. For further information on these rights, please refer to Section "YOUR RIGHTS IN DETAIL".

You also have the right to lodge a complaint with a data protection supervisory authority. To exercise your rights please contact us as stated in Section "CONTACT US".

9. YOUR RIGHTS IN DETAIL

a. Right of access

You may have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data. The access information includes – inter alia – the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipients to whom the personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access.

You may have the right to obtain a copy of the personal data undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

b. Right to rectification

You may have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

c. Right to erasure ("right to be forgotten")

Under certain circumstances, you may have the right to obtain from us the erasure of personal data concerning you and we may be obliged to erase such personal data.

d. Right to restriction of processing

Under certain circumstances, you may have the right to obtain from us restriction of processing your personal data. In this case, the respective data will be marked and may only be processed by us for certain purposes.

e. Right to data portability

Under certain circumstances, you may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from us.

f. Right to object

If the processing of your personal data is based on legitimate interests, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us and we can be required to no longer process your personal data.

Moreover, if your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case, your personal data will no longer be processed for such purposes by us.