

## OUR APPROACH TO PRIVACY

**Your Privacy is important to us.**

**Brilloca Limited (“Brilloca”)**, a company incorporated under the Companies Act, 2013 having its Registered Office at 2, Red Cross Place, Kolkata, West Bengal-700 001 and Corporate Office at 301/302 3rd Floor Park Centra Sector-30 Gurgaon-122001, Haryana, India.

**Brilloca** recognizes that privacy is a fundamental human right and further recognizes the importance of privacy, security and data protection to our customers and partners worldwide. We strongly encourage you to take some time to read our Privacy Statement in full.

### **PRIVACY POLICY:-**

**BRILLOCA** respects the privacy of every individual who visits or register on our website i.e. <https://www.hindwarehomes.com> (mobile app/website). BRILLOCA is sensitive to the privacy concerns of its registered members to its mobile app/website and recognizes that you are concerned about the information you provide us and how we treat that information. This privacy statement (“Statement” or “Privacy Policy”) provides information about the ‘personal information’ that BRILLOCA collects, and the ways in which BRILLOCA uses that personal information (‘personal data’).

#### **A. PRIVACY PRINCIPLES: TO WIN THE TRUST OF THE VISITORS AND REGISTERED USERS TO ITS MOBILE APP/WEBSITE, BRILLOCA GIVES FOCUSES ON BELOW PRINCIPLES: -**

1. **Data Access & Control:** We will put you in control of your privacy with specific, informed & unambiguous choices with reasonable access along with the ability to review, correct, amend or delete the personal data you have shared with us.
2. **Lawfulness, Fairness & Transparency:** We are transparent in all data collection and use so as you can make informed decisions on your provided data. We only collect personal data which is relevant and limited to what is necessary for the purposes for which it is collected. Our data processing activities are conducted:
  - a. With your consent;
  - b. In order to fulfil our obligations to you;
  - c. For the legitimate purposes of advancing innovation and providing a seamless customer experience; or
  - d. Otherwise in accordance with law.
3. **Data Integrity & Purpose Limitation:** We only use personal data for the purposes described at the time of collection or registration or for additional compatible purposes in accordance with law. We take reasonable steps to ensure that personal data is accurate, complete and current and we only collect personal data which is relevant and limited to what is necessary for the purposes for which it is collected. We will keep personal data for no longer than is necessary for the purposes for which it was collected and then we will securely delete or destroy it.

4. **Data Security & Strong legal protections:** We consider your privacy as a fundamental human right and will respect your local privacy laws. To protect personal data against unauthorized use or disclosure, we implement strong information security controls in our own operations.
5. **No content-based targeting:** Except for the Benefits to you under this Statement, we will not use your email, chat, files or other personal content to target ads to you.
6. **Benefits to you:** When we do collect data, we will use it to benefit you and to make your experiences better.

## **B. PERSONAL INFORMATION COLLECTION:**

We will not collect any personally identifiable information i.e. Personal Data about you (such as your name, address (business or personal), PIN/ZIP code, Mobile number & Telephone (business or personal), e-mail address (business or personal), Log-ID & Password (of mobile app/website) etc.) unless you provide it to us voluntarily during the registration on the mobile app/website. If you opt not to provide us with personally identifiable information at the time of registration no material consequences will result, although you may not be able to get yourself registered or participate in certain promotions, receive product information, corresponding services, certain specialized features or able to effectively respond to any queries you may have or participate in any kind of feedback or services/information as described under this Statement (collectively referred as 'Services').

1. **In general, you may download our mobile app or access our website without providing any Personal Information about yourself. However, we collect certain information from you on registration such as:**
  - a. **Personal information for creation of Account:** Personal Information that you provide voluntarily while creating an Account via our mobile app/website, including information you provide when you register on our mobile app/website e.g. your name, email address (business or personal), mobile number, country and telephone number (business or personal), postal/billing address (business or residential), city, PIN/ZIP code, and any other information that you choose to provide or is necessary for us to provide Services to you, For service related issues product complaint details shall also be required to be shared. This information helps to activate, manage and provide Services in efficient manner;
  - b. **Personal information on providing Services:** We obtain Personal Information when you order or register to receive any of our Services. We collect or receive Personal Information from you when you sign up for our Services, create an online account with us, make a purchase, request details or a call back, submit a technical, customer or billing support request i.e. asking digital warranty or digital invoice, participate in a contest or survey, provide us with feedback or otherwise contact us.
  - c. **User Device/Product Information:** Your model details, IoT device details, unique device identifier (MAC ID, UUID, etc.), IP address, IoT Device, demographics, & Product Firmware version number, Product category or nickname of your device, F/W and S/W information and browser type and information collected via cookies will be collected for you that can interact with the device through mobile app/website.

BRILLOCA does not collect personally identifiable information automatically, but we may tie information collected automatically to your previously submitted personally identifiable information not limited to country code, language, OS, time zone, network, memory capacity, IMEI, etc.;

- d. **Product Information:** All the product information will be collected so that it can be displayed to you via mobile app/website as it would help us to monitor that the product is working right. This refers to all information collected from the product depending on the product category and what action has been applied to product through mobile app/website or information derived upon using our products. The main data will be primarily collected from products (i.e. **Faucets, EWC, Concealed Cisterns** or any other product which would be sold in future using Geo-Fence & IoT technology or otherwise). We will capture some **product data** generated from the above products to show the required information on your mobile app/website page.
1. **For Geo-Fence:** We will capture customer background & fine location along with customer location coordinates both longitude & latitude. We will be taking your permission before accessing such information as and when you (being customer) try to use our Geo-fence service. If no permission is granted by you than we will not be in position to provide the required Product Services under Geo-Fence.
  2. **Smart (IoT) Device/Product Information:** All the smart device/product information will be collected so that it can be displayed to you via mobile app or it would help us to monitor that the product is working right.
    - This refers to all information (including technical data & data inserted by customer in the mobile app) collected from the product depending on the product category and what action has been applied to product through mobile app or you may be using our products.
    - The main data will be primarily collected from the IoT based products when such IoT based products are connected with power & internet and controlled through our mobile app.
  3. We will capture some product data and technical information generated from the above said IoT based products to show the required information on your mobile app page.
  4. For Alexa & Google Home & Siri configuration:
    - a) For supporting the configuration process of our products some of your information will be shared with Alexa & Google Home & Siri to provide better accessibility of your products through their platform.
    - b) You as a user/customer/account holder of our mobile app agree on to the said privacy policy and the privacy policies of Alexa & Google Home& Siri also when accessing our product through these devices.
- e. **Picture/video:** The picture or video acquired via this mobile app would help us to display your products to you on the mobile app so that you can manage them easily.
- f. **Cookie related details are provided in the Cookies Policy.**
- g. **We collect data from the following third parties:** Commercially-available data such as name, address, email address, preferences, interests, and certain demographic data.

For example, personal data may be collected when you access our mobile app/website through social media logins (i.e. logging in to our applications using your Facebook, Twitter or other social media credentials). The basic details we receive may depend on your social network account privacy settings.

- h. **User Generated Content:** We may invite you to post content on our Sites, including your comments, pictures, and any other information that you would like to make available on our Sites. If you post content to our Sites, the information that you post will be available to other visitors to our Sites. If you post your own content on our Sites or Services, your posting may become public and we cannot prevent such information from being used in a manner that may violate this Policy, the law, or your personal privacy.
2. **Pseudonymisation:** Anonymous answers to surveys or anonymous and aggregated information about how our products & Services are used. In certain cases, we apply a process of de-identification or pseudonymisation to your data to make it reasonably unlikely to identify you through the use of that data with available technology.

### **C. CHILDREN PRIVACY:**

BRILLOCA Services are made for the general public. BRILLOCA does not knowingly collect data from children as defined by local law without the previous consent of their parents or legal guardians or as otherwise permitted by applicable law.

### **D. USING PERSONAL INFORMATION:**

BRILLOCA may store and process your personally identifiable information to understand your needs better and how we may improve our products and Services, and to contact you (viz. we may send you marketing or promotional materials or other information), we may respond to your comments or requests for information.

1. Your information may be shared with agents or contractors of BRILLOCA in connection with Services that these individuals or entities perform for BRILLOCA and ensure that they maintain the Confidentiality of the said shared information. BRILLOCA will not give, share or forward your personal identifiable information to any outside organization or with third parties, unless BRILLOCA needs to share your personal information to provide the product or Service you have requested and BRILLOCA have asked for and obtained your explicit consent. The foregoing notwithstanding, if
  - a. Disclosure was required by law, rule or regulation or was in response to a valid order of a court or authorized agency of government or other legal process and/or;
  - b. We need to operate and also maintain the security of this mobile application/website, including to prevent or stop an attack on our computer systems or networks;
  - c. When BRILLOCA finds your action on the mobile app/website violates the BRILLOCA terms and condition or any of your usage guidelines for specific products or Services.

- d. You request or authorize us to do so;
2. We process Personal Information for marketing and sales activities based on your consent, where it is required and so indicated on our sites or at the time your personal data is collected, or further to our **legitimate interest to market and promote our products and Services**;
  3. We rely on our **legitimate interests** to process personal data and other information in order to analyse, develop, improve and optimise our Sites, products and Services, and to maintain the security and integrity of our Sites, network and systems. We also have a legitimate interest in using your personal data in connection with legal claims, compliance, regulatory and investigative purposes as necessary; or because of applicable laws (including telecommunications laws), regulations or the public interest require us to, such as to comply with legal processes, law enforcement or regulatory authorities or to assist in the prevention, detection or prosecution of crime or to process an opt-out request. Hence, BRILLOCA use your Personal Information for the following purposes:
    - to provide better usability, troubleshooting and site maintenance;
    - to understand which parts of the mobile app/website are visited and how frequently;
    - to create your user ID;
    - to verify your identity.
    - to prevent and trace fraudulent or inappropriate usage.
    - to identify you once you register on our mobile app/website;
    - to assist you in completing transactions and orders of our products or Services, administering your account, processing payments, arranging shipments and deliveries and facilitating repairs and returns;
    - to develop our existing products and services, together with general and statistical information.
    - to innovate new products, features and Services using research and development tools and incorporating data analysis activities.
    - to conduct investigations regarding our products and services.
    - to attend & provide maintenance services/services, to improve our products or analyse the efficiency of our operations.
    - to show more relevant & meaningful product health data on your mobile screen.
    - to personalize product design and to provide you with services tailored for you.
    - to understand how you are using our product & services.
    - to develop more customers oriented future products & service.
    - to provide marketing and promotional materials to you about our products and services (please note that you may unsubscribe anytime).
    - to communicate with you, including providing you with notifications on products and services that are updated or launched.
    - to contact you and respond to your questions or requests;
    - to provide access to desirable content based on your preferences and how we may improve our products and Services.
    - to provide personalized promotional offers (in accordance with your Privacy Preferences) on BRILLOCA mobile app/website and other selected partner websites (for example, you might see an advertisement for a product on a partner

site that you have recently viewed on BRILLOCA site). We might also share some of your information with selected partners, marketing service providers and digital marketing networks to present advertisements that might interest you.

- To understand how you are using our product & services.
  - To develop more customers oriented future products & service.
4. If you choose not to provide desired information then we may not be able to provide the deliverables as stated in preceding **point no. 2** of Using Personal Information as described in this Statement.
  5. Should any user of the mobile app/website respond with information including feedback data such as questions, comments, suggestions on this mobile app/website, such information shall be deemed to be non-confidential and BRILLOCA shall deal with the same in the manner it deems fit in accordance to this Statement.

#### **E. SECURING YOUR DATA: DATA RECIPIENTS, TRANSFER, AND DISCLOSURE OF PERSONAL INFORMATION:-**

1. BRILLOCA does not share your Personal Information with third parties for marketing purposes without seeking your prior permission.
2. **Subject to obtaining your consent** as may be required in some jurisdictions, we may share or disclose your personal data as necessary for the purposes described above and as further detailed below, BRILLOCA shall share your Personal Information within
  - a. **BRILLOCA's Affiliates and/or with any of its subsidiaries:** We may disclose the personal data we collect from you to our Affiliates and/or subsidiaries. Where permitted by law and with your consent where required, our affiliates and/or subsidiaries may use your information for the purposes indicated in this Privacy Policy, including to market their products and services to you. In processing your personal data, our affiliates and/or subsidiaries follow practices at least as protective as those described in this Policy.
  - b. **Business, Sales and Marketing Partners:** We may offer some of our Services together with or through third parties who may be system integrators, resellers, solution partners, network partners and affinity organizations. If we do so, we will need to share your personal data with these third parties to assist in providing and marketing that Service to you, as well as to enable the third parties to market their own products and services to you (with your permission, if required). We may also share your personal data with companies that are system integrators, resellers, solution partners, network partners and affinity organizations, and whom we believe might offer products and services of interest to you (again with your permission, if required).
  - c. **Third-Party Service Providers:** We employ other companies and individuals to perform functions that are necessary for the provision of the Services or for any of the purposes described above. Examples include: where permitted, jointly offering a product or service, sending communications, processing payments, assessing credit and compliance risks to give you access to our Services, fraud and financial crime prevention detection and prosecution, analysing data, providing marketing and sales assistance (including advertising and event management), customer

relationship management, providing training, these third parties include; system integrators, resellers, solution partners, network partners, affinity organizations, third party vendors, service providers, contractors or agents, and other carriers or providers that we may disclose personal data to where necessary to provide our Services or fulfil your requests or orders, as well as entities that provide website hosting, service/order fulfilment, customer service, and credit card processing, effecting payments, among others. These third-party service providers have access to personal data needed to perform the functions we have entrusted to them but may not use it for other purposes where they process your personal data on our behalf. Whenever we share personal data with third parties, we take steps to ensure that third party contracts contain appropriate protections for your personal data.

- d. **Business Transfers:** If we are acquired by or merge with another company, or if substantially all of our assets are transferred to another company (which may occur as part of bankruptcy proceedings), we may transfer your personal data to the other company. We may also need to disclose your personal data before any such acquisition or merger, for example to our advisers and any prospective purchaser's adviser.
  - e. **Legal Protection and in Response to Legal Process:** We may disclose the personal data we hold about in order to comply with applicable law, in response to or to pursue judicial proceedings, court orders and in other legal processes. We may also disclose, transfer or share it when we believe in good faith that disclosure is necessary: to protect or enforce our rights; protect your safety or the safety of others; investigate or prevent fraud; to respond to government requests – including from government and national or international law enforcement authorities outside of your country of residence – or for national security, public safety and/or law enforcement purposes. Personal data shall only be disclosed when we in good faith believe that we are obliged to do so in accordance with the law or that there are compelling reasons of public interest for us to do so. This will only be after a careful evaluation of all legal requirements and other relevant considerations, including any infringement on the fundamental rights to privacy or freedom of expression that might be impacted by the disclosure.
  - f. **Sharing Aggregated and De-Identified Information:** We may use your personal data to create aggregated and anonymised information which we may share with third parties. Nobody can identify you from that anonymised information. In other circumstances we may pseudonymise your personal data before sharing it with a third party so that we can re-associate you with the information once it has been processed and returned to us. Whilst the third party will not be able to identify you from the pseudonymised information, we will still be able to. We treat pseudonymised data as though it were personal data and ensure the same level of protection for it when sharing with third parties.
3. BRILLOCA shall take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information.

4. Agents or contractors of BRILLOCA who have access to your personally identifiable information in connection with providing Services for BRILLOCA are required to keep the information confidential and are not permitted to use this information for any other purpose than to carry out the Services they are performing for BRILLOCA. However, BRILLOCA is not liable to any individual who has posted his personally identifiable information on this mobile app/website and is being misused by somebody else due to no fault, negligence or otherwise on the part of BRILLOCA.
5. BRILLOCA do not, and will not, sell personal data to third parties. We do permit third parties to collect the personal data described above through our Services and share personal data with third parties for business purposes as described in this Privacy Statement, including but not limited to providing advertising on our Services and elsewhere based on users' online activities over time and across different sites, services, and devices (so-called "interest-based advertising"). The information practices of these third parties are not covered by this Privacy Statement.
6. We may also share your personal data when we believe, in good faith, that we have an obligation to:
  - a. respond to duly authorized information requests of law enforcement agencies, regulators, courts and other public authorities, including to meet national security or other law enforcement requirements;
  - b. comply with any law, regulation, subpoena, or court order;
  - c. investigate and help prevent security threats, fraud or other criminal or malicious activity;
  - d. enforce/protect the rights and properties of BRILLOCA or its subsidiaries; and
  - e. protect the rights or personal safety of BRILLOCA, our employees, and third parties on or using BRILLOCA property when allowed and in line with the requirements of applicable law.
7. In general, BRILLOCA, domiciled in Gurugram, Haryana India, is the data controller processing your Personal Information.

#### **F. BRILLOCA COMMUNICATIONS:**

1. You can make or change your choices regarding subscription or registration or general communications from BRILLOCA at the data collection point or by using methods described in this section. These options do not apply to communications primarily for the purpose of administering order completion, contracts, support, product safety warnings, or other administrative and transactional notices where the primary purpose of these communications is not promotional in nature.
2. BRILLOCA marketing communications provide information about products, services, and/or support and you can select how these communications are delivered – e.g., via post, email, telephone, or mobile device. Marketing communications may include new product or services information, special offers, personalized content, targeted advertising or invitations to participate in market research or compliance reviews.
3. **You may opt out of receiving these general communications by using one of the following methods:**
  - a. You may uninstall our mobile application/website;



- b. You may not use the OTP sent to your mobile number registered for our mobile app to avoid login into the mobile app/website.
- c. You may remove the ID & Password by choosing 'Delete Your Account' in mobile app/website.
- d. You may change your consent or allow status using the mobile app for barring/disallowing notifications in mobile app.
- e. As and when email notification is effective by us, you may select the email's "Opt out" or "Unsubscribe" link, or follow the instructions included in each email subscription communication;
- f. You can also disable automatic data collection tools, such as web beacons, in email messages by not downloading images contained in messages you receive from BRILLOCA.

#### **G. DATA SECURITY:**

1. BRILLOCA adopts reasonable and appropriate security practices and procedures including administrative, physical security, and technical controls in order to safeguard your Personal Information we collect and process on this mobile application/website.
2. At BRILLOCA, security is our highest priority. We design and deliver our systems and Services with your security and privacy in mind.
3. To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, we have put in place physical, electronic, and managerial procedures to safeguard and secure the personal data we collect through our Websites/mobile app and in the provision of our Services.
4. We have put in place reasonable controls (including physical, technological and administrative measures) designed to help safeguard the personal data that we collect via the Websites/mobile app. No security measures are perfect, however, and so we cannot assure you that personal data that we collect will never be accessed or used in an unauthorized way, which may happen due to circumstances beyond our reasonable control. We have put in place procedures to deal with a suspected personal data breach, and we shall notify you and any applicable regulator of a breach where we are legally required to do so.
5. If you have a user name and password to access our Services, you should take steps to protect against unauthorized access to your password, phone and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen or compromised passwords, or for any activity on your account via unauthorized password activity or other security breach caused by you.

#### **H. DATA RETENTION:**

Personal Information will not be retained for a period more than necessary to fulfil the purposes outlined in this privacy statement, unless a longer retention period is required by law or for directly related legitimate business purposes.

We also delete personal data in accordance with any contractual obligations if any on behalf of one of our customers rather than for our own business purposes.

Where maximum or minimum data retention periods are not otherwise stipulated, we determine appropriate retention period for the personal data by considering:

- a. the amount, nature and sensitivity of the personal data contained in the records;
- b. the potential risk of harm from unauthorised use or disclosure of personal data;
- c. the purposes for which we process the personal data and whether we may be able achieve those purposes through other means;
- d. whether the personal data can be permanently and effectively anonymised;
- e. the security measures in place in relation to that personal data and any other relevant factors.

#### **I. CROSS-BORDER DATA TRANSFERS:**

1. Information that you submit for publication on the mobile app/website will be published on the internet and may be available around the world. You agree to such cross-border transfers of personal information.
2. In addition to the disclosures reasonably necessary for the purposes identified elsewhere above, BRILLOCA may disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

#### **J. OTHER WEBSITES:**

1. This mobile app/website may contain links and access to other third party websites like Alexa, Google Home, Facebook, Twitter etc. and privacy practices of said websites/third parties are different from ours. BRILLOCA is not responsible for the privacy policies or practices of any third party.
  - a. Information collected by third party websites, platforms or applications are not under our control;
  - b. Information collected by third party websites, platforms or applications which you access via links on BRILLOCA are not under our control;
  - c. Banners, sweepstakes and other advertisements or promotions on third party sites that we may sponsor or participate in are not under our control.
2. Such sites, outside our control or purview have their own privacy policies, which you may refer to at your own discretion.
3. Our Sites may include social media plugins such as “like” and “share” buttons. By clicking on such a plugin, the data you want to “like” or “share” will be provided to the relevant social media site. We are not responsible for the practices of such third-party social media sites once you have clicked on any such “like” or “share” button.

#### **K. COOKIES:**

1. The mobile app/website may use cookies. These are small text files, which your mobile app/website uses to enable various features.
2. Necessary cookies: These cookies are strictly necessary to offer the basic functionality of the mobile app/website and to remember your cookie settings.
3. We may also collect information to track user behaviour and preferences for internal analysis from all users of the mobile app/website. This information is collected through the use of server log files and tracking technologies to collect and analyze certain types of technical information and may include cookies and web beacons.
4. You understand, agree and acknowledge that our collection, storage and processing of your personal information is for a lawful purpose and to provide you with services that make this mobile app/website more efficient for you. Refer our Cookies Policy.

#### **L. ACCESS, CORRECTION, DELETING OBJECTION OF YOUR PERSONAL INFORMATION:**

1. You may note that deletion of certain personal identifiable information may lead to cancellation of your registration with the mobile app/website and your access to certain features of the mobile app/website.
2. You as a Data Subject have the right to access, correct (rectification), delete (right to be forgotten) or transfer (data portability) your Personal Information that we hold, including your profile and preferences, you can always do so by sending a request to us on the e-mail id provided here below.
3. You also have the right to object to certain processing ('restriction of processing') and, where we have asked for your consent to process your Personal Information, to withdraw this consent. Where we process your Personal Information because we have a legitimate interest in doing so (as explained above), you also have a right to object to this. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your Personal Information.
4. You can assert your rights in the corresponding sections where such information was provided or by contacting us at [care@hindware.co.in](mailto:care@hindware.co.in)

#### **M. HOW TO CONTACT US:**

1. You have the right to ask us for a copy of any personal data that you have provided to us or that we maintain about you and to request an explanation about the processing. In addition, you have the right to withdraw any consent previously granted or to request correction, amendment, restriction, anonymization or deletion of your personal data; and to obtain the personal data you provide with your consent or in connection with a contract in a structured, machine readable format and to ask us to transfer this data to another data controller.
2. To exercise your rights, or if you have any questions or concerns about our Privacy Statement, our collection and use of your data or a possible breach of local privacy laws, you can contact us or **Data Protection Officer** or write to us at the appropriate address below:

**Contact person:** Arjit Tandon

**Contact address:** 301-302, Park Centra Sector-30, National Highway 8 Gurgaon, Haryana (Haryana) - 122001

**Phone:** 0124-4779200

**Email:** care@hindware.in

3. All communications will be treated confidentially. Upon receipt of your communication, our representative will contact you within a reasonable time to respond to your questions or concerns. In some cases, we may request further information in order to verify your identity. We aim to ensure that your concerns are resolved in a timely and appropriate manner.

#### **N. UPDATES & CHANGES TO THIS PRIVACY STATEMENT:**

1. **BRILLOCA** may change the data privacy practices and update this Privacy Statement as and when the need arises, and the same will be made available on the mobile app/website.
2. We recommend that you re-visit this Statement from time to time to learn of any such changes to this Statement. But our commitment to protect the privacy of mobile app/website users will continue to remain. We may also make changes to comply with developments in applicable law or regulatory requirements.
3. If we make significant changes to our Privacy Statement that materially alter our privacy practices, we may also notify you by other means, such as sending an email or posting a notice on our corporate website and/or social media pages prior to the changes taking effect.

#### **O. YOUR OPTION:**

You have confirmed that you have read, understand and receive all the content of this Privacy Policy before you agree or in other ways to use the Services from us. Once you use this Service, you agree to all the provisions of this Privacy Policy. If you do not agree with this Privacy Policy, you shall not use the Service provided by us and you have a right to withdraw consent for usage of information at any time for future processing.