

Website Data Privacy Policy

Effective Date: 24 September 2026

This Website Data Privacy Policy explains how Global Wave Dynamics (“GWD”, “we”, “us” or “our”) collects, uses, shares, stores and protects personal data when you visit or interact with our website, online forms, digital campaigns, social media pages, events, webinars, downloadable resources, newsletters or other online services that link to this policy.

GWD is headquartered in India and provides business process management, outsourcing, Global Capability Center support and operational services for aviation, shipping, logistics, transportation, IT, finance, operations and back-office functions. This policy is designed to align with applicable Indian data protection and cyber laws, including the Digital Personal Data Protection Act, 2023, the Digital Personal Data Protection Rules, 2025, and the Information Technology Act, 2000, together with the provisions, rules, directions and regulations in force from time to time.

If you are located outside India, additional privacy laws may apply to your personal data. Where such laws apply, we will handle your personal data in accordance with those requirements as well.

1. Scope of this Policy

This policy applies to personal data collected through:

- The GWD website and landing pages, including globalwavedynamics.com and related campaign pages;
- Contact, enquiry, lead generation, subscription, demo request and event registration forms;
- Downloads such as whitepapers, calculators, case studies, reports and gated resources;
- Email campaigns, newsletters, social media campaigns, digital advertising and analytics;
- Business communications with prospects, customers, vendors, partners and website visitors;
- Career or recruitment forms, if submitted through the website or linked channels.

This policy does not override a separate customer, vendor, employment, candidate, master services, data processing or confidentiality agreement signed with GWD. Where GWD processes data on behalf of a customer, the customer agreement will normally control the processing of that customer data.

2. Key Privacy Roles

Role	How it applies to GWD
Data Fiduciary	When GWD collects and uses personal data for its own purposes, such as website enquiries, marketing, analytics, service communication or compliance, GWD acts as a Data Fiduciary under Indian data protection law.
Data Processor	When GWD processes personal data only on behalf of a client under a service agreement, such as operational, finance, IT, back-office or logistics process data, GWD generally acts as a Data Processor and follows the client’s documented instructions.
Data Principal	A Data Principal means the individual to whom the personal data relates. In the case of a child or a person who requires lawful support, this may include a parent or lawful guardian as recognized under applicable law.
Designated contact	Privacy queries, rights requests and complaints may be sent to privacy@globalwave.ai with “Privacy Request” in the subject line. GWD will route such requests to the appropriate Privacy / Designated Officer.

3. Personal Data We Collect

The personal data we collect depends on how you interact with us. We aim to collect only the data that is necessary for a clear, lawful and limited purpose.

Category	Examples	Common sources
Identity and contact data	Name, work email address, phone number, company name, designation, country, city, business address and communication preferences.	Directly from you; business cards; email; forms; event registration; public business sources.
Business enquiry data	Service interest, industry, operational requirement, preferred contact method, submitted message, budget/range details if voluntarily shared, and related business context.	Directly from you through website forms, email, calls, meetings or campaign responses.
Marketing and engagement data	Newsletter subscription, event participation, whitepaper or calculator downloads, campaign clicks, content preferences and opt-in/opt-out records.	Directly from you; email marketing tools; analytics and advertising platforms.
Website and device data	IP address, browser type, device type, operating system, referral URL, pages viewed, time spent, clicks, interactions, approximate location derived from IP and cookie identifiers.	Collected automatically through cookies, tags, pixels, analytics tools and server logs.
Communication data	Messages, queries, feedback, call notes, meeting notes, support requests, social media interactions and related correspondence.	Directly from you; GWD teams; communication and CRM tools.
Career data, where applicable	Resume/CV, professional profile, employment history, qualifications, portfolio links, current organization, expected compensation and other information provided for recruitment.	Directly from candidates or recruitment partners, if applicable.
Client or service data	Operational data, process records, customer or vendor data, finance data, IT support records, shipment or aviation process information, documentation metadata and similar information processed for clients.	Provided by GWD clients or processed under client instructions in accordance with contract terms.
Compliance and security data	Audit logs, access records, security alerts, fraud or abuse indicators, incident records and information required for legal or regulatory compliance.	Security systems, IT tools, service providers, internal monitoring and legal/regulatory requests.

Please do not submit sensitive personal data, special category data, government identification numbers, financial account credentials, health data, children's data or third-party personal data through the website unless GWD specifically requests it for a lawful purpose and you are authorized to provide it.

4. How We Collect Personal Data

We collect personal data in the following ways:

- Directly from you when you submit a form, download content, subscribe to updates, register for an event, request a proposal, apply for a role or communicate with us.
- Automatically when you use the website, through cookies, pixels, analytics, logs and similar technologies.
- From third parties such as CRM, email marketing, advertising, analytics, social media, webinar, recruitment, public business directory and lead intelligence service providers, where permitted by law.
- From GWD clients where personal data is provided for service delivery under a contract or statement of work.

5. Purposes and Legal Grounds for Processing

Under India's DPDP framework, we process personal data for a lawful purpose based on your consent or for certain legitimate uses permitted under applicable law. Where another privacy law applies, we may rely on the legal basis recognized by that law, including consent, steps requested before entering into a contract, performance of a contract, compliance with a legal obligation or another applicable lawful basis.

Purpose	Description	Ground / basis
Responding to enquiries	To respond to website forms, calls, emails, service requests, proposal requests or meeting requests.	Consent; requested communication; business purpose; pre-contractual steps.
Providing services	To deliver, manage, improve and support GWD services under contracts with customers.	Contractual necessity; client instructions; lawful purpose; legitimate business operations.
Marketing and thought leadership	To send newsletters, event invitations, whitepapers, case studies, service updates and campaign communications.	Consent where required; opt-out based business marketing where permitted; legitimate business interest under applicable non-Indian laws.
Website analytics and improvement	To understand visitor engagement, diagnose issues, improve content, measure campaign performance and optimize the website.	Consent for non-essential cookies where required; legitimate website operation for strictly necessary cookies.
Security and fraud prevention	To protect systems, detect unauthorized access, monitor threats, prevent misuse, investigate incidents and maintain service continuity.	Lawful purpose; security obligations; legitimate use; legal obligation where applicable.
Recruitment	To evaluate candidate applications, communicate about roles and maintain hiring records.	Consent; candidate request; legitimate recruitment administration; legal obligation.
Compliance and legal rights	To comply with laws, regulatory directions, tax/accounting obligations, cyber incident reporting, legal claims, audits and enforcement requests.	Legal obligation; lawful purpose; protection of GWD's rights and interests.
Business administration	To manage vendors, partners, corporate transactions, internal reporting, governance, training and operational planning.	Lawful purpose; contractual necessity; legitimate business operations.

6. Consent, Withdrawal and Preferences

Where we rely on consent, the request will be presented independently of unrelated information in clear and plain language. It will describe the personal data to be processed, the specific purpose and the goods, services or uses enabled by that processing, and it will explain how you may withdraw consent, exercise your rights and raise a complaint. You may refuse or withdraw consent, and withdrawing consent will be as easy as giving it. Withdrawal will not affect the lawfulness of processing based on consent before withdrawal, but we will stop the relevant processing within a reasonable time unless continued processing is required or permitted by applicable law.

You may unsubscribe from marketing emails by using the unsubscribe link in the email or by contacting us. We may still send service, transactional, compliance or security-related communications where necessary.

If a registered consent manager or similar tool is made available for GWD services, you may be able to manage consent through that mechanism in addition to contacting GWD directly.

7. Cookies and Similar Tracking Technologies

We use cookies, pixels, tags, web beacons, server logs and similar technologies to operate the website, understand usage, improve performance, personalize content and measure marketing effectiveness.

Cookie type	Purpose	Control
Strictly necessary cookies	Enable core website functions, security, page navigation and form submission.	Usually always active because the website may not work properly without them.

Cookie type	Purpose	Control
Analytics cookies	Help us understand how visitors use the website, which pages are useful and where improvements are needed.	Used with consent or preference controls where required.
Marketing cookies and pixels	Measure campaigns, build business audiences, manage ads and understand engagement across platforms such as search, LinkedIn or social media.	Used with consent or opt-out controls where required.
Functional cookies	Remember preferences such as language, display or previous interactions.	Used to improve experience where enabled.

You can control cookies through browser settings and, where available, through the website cookie banner or preference center. Blocking certain cookies may affect website functionality or personalization.

When you first visit our website, a cookie consent banner may allow you to accept, reject or customize non-essential cookie preferences. Non-essential analytics, functional or marketing cookies will be used only after the required consent, or other legally valid choice has been obtained. You may change or withdraw your preferences through the available preference controls.

8. Marketing Communications

GWD may use your business contact information to send relevant updates about aviation, logistics, shipping, IT, finance, operations, back-office, outsourcing, GCC enablement, events, insights, calculators, case studies or service capabilities where we have obtained consent or another applicable legal basis. Each promotional email will provide an effective way to unsubscribe, and we will honor withdrawal or opt-out requests within the applicable period. Necessary service, security, legal or transactional communications may continue where permitted by law.

9. Disclosure of Personal Data

We do not sell personal data. We may share personal data where necessary for the purposes described in this policy.

Recipient category	Reason for sharing
GWD group entities and teams	For business development, service delivery, operations, finance, IT, security, governance and management.
Service providers	Hosting, cloud, CRM, email marketing, analytics, advertising, webinar, form capture, IT support, cybersecurity, recruitment, legal, finance and professional advisory providers.
Clients and business partners	Where required for service delivery, meetings, proposals, support, project execution, audits or contracted obligations.
Government, regulators and authorities	Where disclosure is required by law, court order, regulatory direction, cyber incident reporting, law enforcement or to protect legal rights.
Corporate transactions	In connection with a merger, acquisition, restructuring, financing, investment, sale of assets or similar transaction, subject to appropriate safeguards.
With consent or instruction	Where you direct us or consent to the sharing, or where our client instructs us under a contract.

We require service providers to use personal data only for authorized purposes and to maintain appropriate confidentiality, security and data protection controls.

Global Wave Dynamics does not sell, rent, trade, or commercially disclose personal data to third parties for independent marketing purposes.

10. International Transfers

Because GWD serves global businesses, personal data may be transferred to, accessed from or stored in countries outside your location, including India and other jurisdictions where GWD, its clients or service providers operate. We will take reasonable steps to ensure that such transfers are lawful, limited to the relevant purpose and protected through contractual, organizational and technical safeguards.

For personal data subject to India's DPDP framework, GWD will comply with restrictions notified by the Government of India for transfers of personal data outside India, if and when applicable to the data and processing activity. For EEA/UK or other regulated data, GWD will use appropriate transfer safeguards such as contractual clauses or equivalent protections where required.

Where personal data is transferred outside India, GWD will implement appropriate contractual, technical and organizational safeguards designed to protect such data and comply with applicable transfer restrictions.

11. Security Measures

GWD uses reasonable technical, organizational, administrative and physical safeguards designed to protect personal data from unauthorized access, alteration, disclosure, loss, misuse or destruction. Security measures may include access controls, role-based permissions, authentication, encryption where appropriate, secure hosting, malware protection, vulnerability management, logging, monitoring, training, vendor due diligence, incident response and internal policies.

No system or transmission method is completely secure. If you believe your interaction with GWD is no longer secure, please contact us immediately using the details in the Contact section.

While GWD uses reasonable security safeguards, no electronic transmission or storage system can be guaranteed to be completely secure. This statement does not limit GWD's obligations or any rights available to Data Principals under applicable law.

12. Personal Data Breach and Cyber Incident Handling

If a personal data breach occurs, GWD will promptly assess, contain, investigate and remediate the incident. Where the DPDP framework applies, GWD will notify each affected Data Principal in a concise, clear and plain manner and notify the Data Protection Board of India in the form, manner and within the timelines prescribed by applicable law. Notifications will include the information required by law, including the nature and extent of the breach, likely consequences, mitigation measures, safety steps available to affected individuals and relevant contact details.

Where a cyber security incident is reportable under CERT-In directions or other Indian cyber security requirements, GWD will assess and report the incident to CERT-In within the applicable prescribed timeline, to the extent the requirement applies.

13. Data Retention

We retain personal data only for as long as necessary for the specified purpose or as required by applicable law. Retention periods are determined by the nature of the data, the purpose notified to the Data Principal, the status of the relevant relationship or request, and applicable legal, security, tax, accounting, audit and dispute-resolution requirements. When consent is withdrawn or it is reasonable to assume that the specified purpose is no longer being served, we will erase the personal data and require our processors to erase it unless retention is necessary for compliance with applicable law.

When personal data is no longer required, we will delete, anonymize, aggregate or securely archive it in accordance with applicable law and internal retention practices. Backup and archival copies may take additional time to remove but will be protected from active use where feasible.

Data type	Indicative retention approach
Website enquiries and business leads	Retained while the enquiry is active and for a reasonable business follow-up period, unless deletion is requested or a longer period is required.
Marketing contacts	Retained until you unsubscribe, withdraw consent, object to processing, become inactive under GWD retention rules or the data is no longer needed.
Client service data	Retained as per client contract, statement of work, data processing terms and applicable legal or audit requirements.
Recruitment data	Retained for the hiring process and a reasonable future opportunity/compliance period, unless law requires otherwise or deletion is requested where applicable. Recruitment records may be retained for up to 24 months from the date of application unless a longer retention period is required by law or consent is obtained for future opportunities.

Data type	Indicative retention approach
Security and audit logs	Retained for security, audit, investigation, regulatory and CERT-In related requirements where applicable.

14. Your Rights as a Data Principal

Subject to applicable law and verification, you may have the following rights in relation to your personal data:

- Right to access information about your personal data and how it is processed.
- Right to correction, completion or updating of inaccurate or incomplete personal data.
- Right to erasure of personal data where continued retention is not necessary for the specified purpose and is not required for compliance with applicable law.
- Right to withdraw consent where processing is based on consent.
- Right to grievance redressal through GWD's designated contact.
- Right to nominate another individual to exercise your rights in the event permitted by law.
- Any other right available under applicable data protection laws in your jurisdiction.

We may ask you to verify your identity before acting on a request. We may decline or limit a request only where permitted by applicable law, including where continued processing or retention is necessary for compliance with law, the establishment, exercise or defense of legal claims, prevention or investigation of an offence, or another applicable statutory exception. Where GWD acts as a Data Processor for a client, we may refer the request to the relevant client and assist that client in accordance with the applicable contract and law.

GWD will respond to valid personal data requests within the timelines prescribed under applicable law, subject to identity verification and any lawful exceptions.

In accordance with applicable law, a Data Principal may nominate another individual to exercise rights on their behalf in the event of death or incapacity, subject to verification and applicable legal requirements.

Requests may be submitted through the Privacy Contact details provided below. GWD may verify the identity of the requester before processing any request and will respond within the timelines prescribed under applicable law.

15. How to Raise a Request or Complaint

To exercise your rights, withdraw consent, ask a question or raise a privacy complaint, please contact:

Contact point	Details
Company	Global Wave Dynamics
Registered office / headquarters	10th Floor, Unit No. 10-006 to 10-009, Emaar Digital Greens, Tower - B, Sector - 61, Gurgaon – 122001, Haryana
Website	https://globalwavedynamics.com/
Privacy / designated officer email	privacy@globalwave.ai (please use "Privacy Request" in the subject line)
Phone	+ 91 124 4275417
Grievance officer / designated officer	Kalpana Saini

If you are not satisfied with our response, you may pursue the grievance process available under applicable law. Where the DPDP Act applies, you must first give GWD an opportunity to resolve the grievance through the contact details above before approaching the Data Protection Board of India in the manner prescribed.

16. Children's Personal Data

Our website and services are intended for business users and are not directed at children. We do not knowingly collect children's personal data through the website. If we learn that children's personal data has been submitted without appropriate authorization, we will take reasonable steps to delete or restrict it, unless retention is required by law.

For the purposes of India's DPDP framework, a child generally means an individual who has not completed eighteen years of age. Where GWD is required to process children's personal data for any lawful and specific purpose, we will follow applicable requirements, including verifiable parental or guardian consent where required.

17. Third-Party Links, Social Media and Public Areas

The website may contain links to third-party websites, platforms, videos, social media pages, payment tools, webinar platforms or embedded content. Those third parties may collect and use personal data under their own privacy policies. GWD is not responsible for the privacy practices of third-party websites or platforms that we do not control.

If you post comments, reviews, public messages or social media interactions about GWD, those posts may be visible to others depending on the platform settings. Please avoid posting personal, confidential or sensitive information in public areas.

18. Client Data Processed by GWD

GWD provides operational, IT, finance, back-office, aviation, shipping, logistics and GCC support services. In that context, GWD may process personal data provided by or on behalf of clients. For such data, GWD generally acts as a Data Processor and processes the data according to the client's documented instructions and the applicable service agreement, statement of work, data processing addendum and confidentiality obligations.

If your personal data has been provided to GWD by one of our clients, please contact that client first for rights requests. Where appropriate, GWD will assist the client in responding to the request as required under the relevant contract and applicable law.

19. Accuracy and Your Responsibilities

Please provide accurate, complete and current information when interacting with GWD. Please do not impersonate another person, submit false information, misuse our website, attempt unauthorized access or provide personal data about another individual unless you have the right to do so.

20. Jurisdiction-Specific Privacy Rights

Depending on where you are located and whether the relevant law applies to GWD's processing activities, you may have additional privacy rights. The following provisions apply only to the extent the relevant jurisdictional law applies.

European Economic Area (EEA)

Where the EU General Data Protection Regulation (GDPR) applies, individuals may have rights including access, rectification, erasure, restriction of processing, data portability, objection to certain processing, withdrawal of consent and the right to lodge a complaint with a competent supervisory authority. Where required, GWD will also use appropriate safeguards for transfers of personal data outside the EEA.

United Kingdom

Where UK data protection law applies, individuals may have rights including access, rectification, erasure, restriction of processing, data portability, objection to certain processing, withdrawal of consent and the right to complain to the UK Information Commissioner's Office or another competent authority. Where required, GWD will use appropriate safeguards for international transfers of UK personal data.

California, USA

Where the California Consumer Privacy Act, as amended, applies, California residents may have rights to know or access certain personal information, request correction or deletion, and exercise applicable opt-out rights, subject to statutory exceptions. GWD will not discriminate against an individual for exercising rights available under applicable California law. Requests may be submitted using the Privacy Contact details in Section 15.

21. Changes to this Policy

We may update this policy from time to time to reflect changes in our services, website, technology, vendors, legal obligations or business operations. The updated policy will be posted on the website with the revised effective date. Material changes may be highlighted through the website, email or other appropriate communication where required.