



SEHAJ SYNERGY TECHNOLOGIES PRIVATE LIMITED

DATA PROTECTION & CONFIDENTIALITY POLICY

**3rd Floor, Plot No. J 9/J 7/3, Opp. JVVNL Office, Bhagwan Marg Road, Swej Farm,
New Sanganer Road, Jaipur, RJ 302019**

Effective Date: 15.10.2021





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Ramkumar
Auth.
Signatory



SEHAJ SYNERGY TECHNOLOGIES PRIVATE LIMITED

DATA PROTECTION AND CONFIDENTIALITY POLICY

1. INTRODUCTION

- 1.1. Sehaj Synergy Technologies Private Limited (the “**Company**”) is committed to ensuring the protection, security and integrity of any data that it collects, processes or otherwise handles, in the course of its business activities.
- 1.2. This policy (“**Policy**”) outlines measures taken by the Company to protect any Personal Information (*as defined below*) that it deals in, in the course of its business operations as well as to preserve the integrity of any confidential information that it receives. Such Personal Information and confidential information may include the Personal Information and confidential information of its customers, consultants, employees, contractors, vendors, business partners as well as any other person that the Company engages with in the course of its business activities.
- 1.3. In India, the Information Technology Act, 2000 and rules thereunder (“**IT Act**”), specifically the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“**SPD Rules**”) governs the treatment of any ‘Personal Information’ or ‘Sensitive Personal Information’ (as defined thereunder and reproduced below) by a body corporate. The Company is in compliance with the IT Act, as well as any other applicable laws in its activities related to handling of Personal Information or Sensitive Personal Information.
- 1.4. All employees of the Company as well as the Company’s contractors, consultants, vendors, partners and other third parties engaged by or on behalf of the Company are required to adhere to the guidelines as stipulated in this Policy, and any obligations required to be undertaken by the Company in respect of the collection or processing of Personal Information or Sensitive Personal Information shall be deemed to be applicable to the relevant person collecting or processing the Personal Information or Sensitive Personal Information.
- 1.5. Any violation of this Policy will be treated strictly and the Company may take strict action against such person: if such violation is by an employee, disciplinary measures or removal or dismissal from the Company, and if by a third party or person engaged by or on behalf of the Company, immediate termination of such engagement, along with invoking damages, if the Company deems fit.

Ramesh Kumar
Secretary



2. PROCEDURAL MEASURES FOR HANDLING OF PERSONAL DATA

- 2.1. **“Personal Information”**, as defined under the SPD Rules, means ‘*any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.*’
- 2.2. **“Sensitive Personal Information”** of a person means “*such personal information which consists of information relating to— (i) password; (ii) financial information such as bank account or credit card or debit card or other payment instrument details; (iii) physical, physiological and mental health condition; (iv) sexual orientation; (v) medical records and history; (vi) Biometric information; (vii) any detail relating to the above clauses as provided to body corporate for providing service; and (viii) any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise.*”
- 2.3. During the course of its business operations, the Company, its employees, contractors, consultants, vendors, partners and other third parties engaged by or on behalf of the Company may come into contact with certain Personal Information or Sensitive Personal Information. The Company and each person mentioned above are required to ensure that the steps as prescribed in Paragraph 2 (*Procedural Measures for Handling of Personal Data*) will be adhered to for collection and processing of the Personal Information or Sensitive Personal Information.
- 2.4. The Company has published a privacy policy available at www.sstpl.in which sets out the privacy practices of the Company in relation to its handling of Personal Information and Sensitive Personal Information. The privacy policy, *inter-alia*, contains:
- 2.4.1. The type of Personal Information and Sensitive Personal Information collected by the Company or any person on its behalf;
- 2.4.2. The purpose and usage of the Personal Information and Sensitive Personal Information;
- 2.4.3. The disclosure of the Personal Information and Sensitive Personal Information; and
- 2.4.4. Security practices and procedures adopted by the Company with respect to protecting unauthorized disclosure of such Personal Information and Sensitive Personal Information.
- 2.5. Prior to the collection of any Personal Information or Sensitive Personal Information, an option shall be provided to the provider of the Personal Information or Sensitive Personal

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- 2.6. Information (“**Data Provider**”), to not to provide such information. The Company may also inform the Data Provider the consequences of not providing the requested Personal Information or Sensitive Personal Information.
- 2.7. Prior to collection of any Sensitive Personal Information, consent of the Provider of the Sensitive Personal Information shall be obtained, through agreement, letter, email, fax or writing through other electronic means regarding purpose of the usage of the Sensitive Personal Information.
- 2.8. The Provider of the Sensitive Personal Information shall reasonably be made known of the following:
 - 2.8.1. the fact that the Sensitive Personal Information is being collected;
 - 2.8.2. the purpose for which the Sensitive Personal Information is being collected;
 - 2.8.3. the intended recipients of the Sensitive Personal Information; and
 - 2.8.4. the name and address of the agency collecting the Sensitive Personal Information as well as the agency that will retain the Sensitive Personal Information.
- 2.9. The Personal Information or the Sensitive Personal Information shall not be used for any purpose other than for which it was collected or as otherwise permitted by the Data Provider in writing, unless such use is pursuant to any obligations under applicable law.
- 2.10. The Personal Information or Sensitive Personal Information shall not be retained for longer than the time period that it is required for the purpose for which it was collected. For example, if the Company has collected any Personal Information or Sensitive Personal Information of any prospective employee, but such prospective employee has thereafter not been hired by the Company, the Company shall not store the Personal Information or Sensitive Personal Information of such person unless such person has agreed for his/her Personal Information or Sensitive Personal Information to be retained by the Company for future employment prospect. However, the Company may retain the Personal Information or Sensitive Personal Information for performance of any of its obligations under applicable law.
- 2.11. The Company shall not transfer Sensitive Personal Information, to any other body corporate or a person in India, or located in any other country, unless such body corporate or person ensures the same level of data protection that is adhered to by the Company as provided for in this Policy, and any other requirements as prescribed under applicable law. Further, the transfer shall only be allowed if it is necessary for the performance of





the lawful contract between the Company and Data Provider, or where the Data Provider has consented to the data transfer.

- 2.12. The Company shall permit the providers of the Personal Information or Sensitive Personal Information to review the information which they have provided, as and when requested by them, and to make any requests to the Company to correct the available Personal Information or Sensitive Personal Information, as feasible.
- 2.13. The Company shall not be responsible for the authenticity of the Personal Information or Sensitive Personal Information supplied by the provider of the Personal Information or Sensitive Personal Information to the Company or any person acting on its behalf.
- 2.14. The Company shall also provide the provider of the Personal Information or Sensitive Personal Information the option to withdraw their consent after they have provided the Personal Information or Sensitive Personal Information. However, such withdrawal of consent may lead to the Company being unable to provide the services to such individual.
- 2.15. The Company shall not disclose the Sensitive Personal Information collected to any other body corporate without prior permission of the provider of the Sensitive Personal Information unless consent for such transfer has been obtained previously from the provider of the Sensitive Personal Information under lawful contract or otherwise. However, the Company may disclose the Sensitive Personal Information to any government agency or to any other body corporate, pursuant to a requirement under applicable law.

3. GRIEVANCE OFFICER

- 3.1. The Company has appointed Mr. Mohit Jain as the Grievance Officer of the Company, to handle any discrepancies and grievances of any of the Data Providers, in relation to their Personal Information or Sensitive Personal Information which they have provided to the Company.
- 3.2. If any Data Provider desires to raise a complaint or grievance, he/ she may address an email to the Grievance Officer at mj@sstpl.net.in or a letter to J-9-J-7, Indu Bhawan, 3rd Floor, JVVNL, Near MJRP College, Bhawan Marg Road, Swage Farm, Sodala, Jaipur. Such contact details of the Grievance Officer shall also be provided in the privacy policy of the Company, available on the Company's website.
- 3.3. The Grievance Officer shall redress any complaints received within 1 (one) month of such complaint received by the Company/ Grievance Officer.



4. SECURITY MEASURES ADOPTED BY THE COMPANY

- 4.1. The Company implements such security practices and standards that are commensurate with the information assets being protected with the nature of business. [The Company also has a documented information security programme and information security policies that contain managerial, technical, operational and physical security control measures].
- 4.2. The Company has implemented IS/ISO/IEC 27001 on "Information Technology - Security Techniques - Information Security Management System - Requirements", as part of its information security framework.
- 4.3. The Company undertakes yearly audits of its information security framework, and engages an independent auditor, duly approved by the central government under the SPD Rules, for this purpose. The Company also undertakes an audit when it undertakes significant upgradation of its process and computer resource.

5. CONFIDENTIALITY

- 5.1. In the course of its business operations, the Company or any persons acting on its behalf, including employees of the Company may come into contact with certain confidential information of the Company's clients, suppliers, vendors, or other parties which the Company deals with, or with the Company's own proprietary or confidential information. Confidential information shall be deemed to be information whether disclosed through written means, or by oral means, or otherwise, which is marked expressly as confidential or such other information which can be reasonably inferred to be of a confidential nature. However, confidential information will not include any information which: (a) is already in the public domain at the time of disclosure or thereafter; or (b) has been independently developed without reference to the confidential information.
- 5.2. The Company treats all confidential information with a degree of care as required by industry standards, and ensures that confidential information is only disclosed to such persons who have a 'need to know' such information whether for performance of necessary services, or to its financial, legal and secretarial consultants and advisors.
- 5.3. The Company executes appropriate agreements with all of its employees and any third parties that it engages committing them to treat any confidential information with a degree of care at least as stringent as in this Policy. All employees, contractors, consultants, vendors and other persons engaged by or on behalf of the Company are required to strictly abide by the provisions of this Policy.
- 5.4. The confidentiality obligations in this Policy will not apply to any disclosure which is required to be made by the Company, its employees or other concerned persons pursuant

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to any order, notice or instructions of any governmental or statutory authority or any court of law or regulations as required by applicable law. Provided that if an employee or such other concerned person receives any such order, notice or instructions, he/ she will intimate the Company prior to making any disclosure. Provided that such person shall provide reasonable assistance to the Company to enable the Company to obtain an injunction against the mandated disclosure, or such other remedy available to the Company under law to prevent disclosure.

6. QUESTIONS/ CONCERNS

6.1. If any of the employees have any questions on this Policy, such questions may be addressed to the Company Compliance Officer (as appointed under the Company’s Code of Business Ethics) or to the employee’s supervisor.

7. REVIEW AND AMENDMENTS

7.1. This Policy shall be subject to review, from time to time. Any amendments to this Policy shall be in writing and effective upon a resolution being passed by the board of directors of the Company approving such amendments. Brief details of each amendment shall be in the format specified below:

Date	Version	Description of Amendments

Effective Date: 15.10.2021

Quantity verified