Data Protection and Privacy Policy

Endurance Technologies Private Limited

ETPL-ISMS-PO_20
# Data Protection and Privacy Policy

## Document Information

<table>
<thead>
<tr>
<th>Title:</th>
<th>Data Protection and Privacy Policy</th>
<th>Version No:</th>
<th>1.0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Created By:</td>
<td>Information Security Manager</td>
<td>Date:</td>
<td>31-Dec-2013</td>
</tr>
<tr>
<td>Approved By:</td>
<td>Chief Information Security Officer</td>
<td>Date:</td>
<td>01-Apr-2014</td>
</tr>
<tr>
<td>Released By:</td>
<td>Endurance Technologies Private Limited [ETPL]</td>
<td>Date:</td>
<td>01-Apr-2014</td>
</tr>
</tbody>
</table>

## Version History

<table>
<thead>
<tr>
<th>Version</th>
<th>Version Date</th>
<th>Version Author/s</th>
<th>Description</th>
<th>Approved By</th>
<th>Approved Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>07-Mar-2014</td>
<td>Endurance Technologies Private Limited</td>
<td>First publication and compliance of IT act, 2012</td>
<td>Chief Information Security Officer</td>
<td>01-Apr-2014</td>
</tr>
</tbody>
</table>
Table of Contents

1. Purpose............................................................................................................................................. 4
2. Consent.............................................................................................................................................. 4
3. Purpose of Collection of Information................................................................................................. 4
4. Update Personal Information............................................................................................................... 5
5. Sharing/Transfer/Disclosure of Personal information ........................................................................ 5
6. Retention of Personal Information ................................................................................................... 6
7. Use of Cookies.................................................................................................................................. 6
8. Blocking IP Addresses ....................................................................................................................... 7
9. Change in Data Protection and Privacy Policy .................................................................................. 7
10. Grievances........................................................................................................................................ 7
1. Purpose

Data Protection and Privacy Policy sets forth the reasonable security practices and procedures adopted by ETPL and shall apply to receipt, storage, use, disclosure as required under law and sharing of employee’s/customer’s/service provider’s personal data/information (“Personal Sensitive Information”) provided by employee/customer/service provider to ETPL on the website or otherwise. This policy shall be read in conjunction with the terms of use agreed by employee/customer/service provider while registering with ETPL for availing its services like recruitment, payroll, attendance and as and when required for internal company purpose & as per legal and statutory requirement.

2. Consent

ETPL shall obtain employee’s/customer’s/service provider’s consent in writing before collecting personal sensitive information to facilitate its Services like recruitment, payroll, attendance and as & when required for internal company purpose & as per legal, statutory requirement. Personal sensitive information for purposes of this Policy means information that identifies employee/customer/service provider, such as Name, Date of birth, Medical History, Bank Account details or Credit Card or Debit Card, Biometric information, Phone number, Fax number or email address etc. All or any personal sensitive information so disclosed/shared by ETPL shall be on “as is” basis provided by employee/customer/service provider and ETPL shall under no circumstances be responsible for the genuineness and the authenticity of the information furnished by employee/customer/service provider. This personal sensitive information which is provided by employee/customer/service provider is solely for the purposes connected with the terms of use which is agreed by employee/customer/service provider to provide various services by/to the company.

Employee/customer/service provider have an option of either (a) not to provide or (b) agree to the collection of information. If employee/customer/service provider choose not to agree with the policy, employee/customer/service provider will not be entitled to use services as per the terms of use.

3. Purpose of Collection of Information

ETPL needs this minimal information to operate and provide various services. ETPL uses
and discloses employee’s/customer’s/service provider’s personal sensitive information only as follows:

- To deliver to employee/customer/service provider any administrative notices, alerts, and communications relevant to employee’s/customer’s/service provider’s use.
- Share employee’s/customer’s/service provider’s information with their group companies and other third parties insofar as required for any changes in service, requirement.
- For troubleshooting problems, detecting and protecting against error, fraud or other criminal activity.
- To third-party contractors that provide services to ETPL and are bound by these privacy requirements or such requirements made applicable by ETPL from time to time.

4. Update Personal Information

ETPL encourages employee/customer/service provider to update this information as and when there are any changes. Employees/customers/service providers are also entitled to review the information provided and ensure that any personal information or data found to be inaccurate or deficient be corrected or amended. However, ETPL shall not be responsible for the authenticity of the personal sensitive information or sensitive personal data or information supplied by employee/customer/service provider.

5. Sharing/Transfer/Disclosure of Personal Information

Personal sensitive information of the users will not be sold or otherwise transferred to unaffiliated third parties unless otherwise stated at the time of collection or without the written approval of the user, as the case may be. However, ETPL might share, exchange and disclose information to its affiliates and/or group companies, agents or to any third party service provider to deliver employee/customer/service provider services in the manner agreed by employee/customer/service provider.

ETPL treats employee’s/customer’s/service provider’s personal sensitive information as private and confidential and does not check, edit, or reveal it to any third parties except where it is expressly agreed.

ETPL may disclose personal sensitive information where it is under legal obligation to do so or where it is mandated under law. ETPL may transfer sensitive personal data or
information to another Indian or overseas body corporate that ensures the same level of data protection that is adhered to by ETPL, if it is necessary for the performance of a lawful contract between ETPL or any person on its behalf.

6. Retention of Personal Information

All personal information collected shall be retained so long so employees/customers/service providers are having employment or any type of service, contract with ETPL and remain active to avail various services or as may be required under the law. In case of deactivation / termination of the employment / services with us, the personal sensitive information provided will no longer be used and the same will also get deleted upon the expiry of the maximum tenure as may be prescribed under the provisions of the law as applicable.

7. Use of Cookies

ETPL websites may use "cookies" (information stored on employee's/customer's/service provider's computer by employee's/customer's/service provider's browser at our request). "Cookies" is a term generally used for small text files a web site can use to recognize repeat users, facilitate the user's ongoing access to and use of the site, allow a site to track usage behavior and compile aggregate data that will allow content improvements and targeted advertising etc. Cookies themselves do not personally identify employee/customer/serviceprovider, but they do identify employee's/customer's/service provider's computer. Generally cookies work by assigning a unique number to the user's computer that has no meaning outside the assigning site. Users are also being made aware that ETPL cannot control the use of cookies or the resulting information by advertisers or third parties hosting data on ETPL website. If a user does not want information collected through the use of cookies, there is a simple procedure in most browsers that allows the user to deny or accept the cookie feature.
8. Blocking IP Addresses

ETPL with the help of Internet Protocol ("IP") addresses to diagnose any problems with its server and to administer its web site including by blocking certain addresses that it feels are inappropriate using its website. IP addresses are used to gather broad demographic information, such as browser types, visitor's country, visiting frequency, operating systems, etc.

9. Change in Data Protection and Privacy Policy

ETPL reserves the right to change the Data Protection and Privacy Policy at any time. Users may note that this Privacy Policy itself and any such change of policy will be effective from the date of posting on the intranet and public website.

10. Grievances

ETPL is very much serious about the Grievances and hence appointed a senior most person as a Grievance officer. In case of any grievances as regards misuse or processing of employee’s/customer’s/service provider’s personal sensitive information, please contact grievance officer Mr. Sanjay Datta on cell 9765410889 or email at grievances@endurance.co.in. The Grievance Officer shall get redress employee’s/customer’s/service provider’s grievances from the concerned responsible person expeditiously not later than one month from the date of receipt of grievance.