

ISRPL Privacy Policy

1. INTRODUCTION

This privacy policy ("Privacy Policy") provides the practices and policies applicable to ISRPL for handling of or dealing in Personal Information, including Sensitive Personal Data or Information (as defined below) that is lawfully collected by ISRPL.

2. GENERAL DEFINITIONS

Reference to “**you**” or “**your**” or “data subject” in this Privacy Policy refers to any vendor, contractor, customer & natural person (including the employees of ISRPL) who provides to ISRPL any Personal Information or Sensitive Personal Data and Information or any user(s) of ISRPL’s website or business applications whether or not, you avail the Services & products offered by ISRPL.

“**Act**” shall mean the Section 43A of Information Technology Act, 2000 and Rules.

“**Information**” shall mean and include Personal Information (PI) and Sensitive Personal Data and Information (SPDI) as may be collected by ISRPL.

“**Personal Information (PI)**” shall have the same meaning as under Rule 2 (i) of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011.

“**Rules**” shall mean the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011.

“**Sensitive Personal Data and Information (SPDI)**” shall mean and include information under Rule 3 of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 as amended from time to time.

“**Services & Products**” shall mean the services & products of ISRPL, sought or requested by way of registration or in any manner, by any vendor, contractor, customer & natural person. .

3. GOVERNING LAW

ISRPL is an organization based and existing in India and is thus bound by the laws of the Republic of India. This Privacy Policy has been prepared in accordance with applicable Indian laws, including the Indian Information Technology Act, 2000

4. APPLICABILITY

This Policy applies to all individuals whose Information is either collected, received, processed, stored, dealt or handled by ISRPL.

5. OBJECTIVE

This Privacy Policy is intended to inform the Data Subject on how ISRPL collects, processes, stores, and uses personal information that a Data Subject provides to ISRPL either directly or indirectly. This Privacy Policy also covers ISRPL’s treatment of any personal information that Third Parties share with ISRPL.

ISRPL is fully committed to respecting your privacy and shall ensure that your Information is safe. This privacy policy sets out the practices adopted in respect of Information, including the types of Information that is collected, how the Information is collected, how the Information is used, how long the Information is retained and with whom it is shared (“**Privacy Policy**”). This Privacy Policy is published in compliance with the provisions of the Act and the Rules made thereunder that require publishing the privacy policy on ISRPL’s website.

ISRPL urges you to read this Privacy Policy carefully before you use or opt to access any services & products of ISRPL or decide to part with any Personal Information (PI) or Sensitive Personal Data and Information (SPDI)

6. COLLECTION OF INFORMATION

ISRPL may collect and process PI/ SPDI provided by you in the following forms:

- i. Information that you provide directly to ISRPL via email or electronic communication;
- ii. Information that you provide to ISRPL over telephone. ISRPL may make and keep a record of such information shared by you;
- iii. Information that you provide to ISRPL in physical form whether sent through post or courier or handed over to a ISRPL representative in person; and
- iv. PI/SPDI collected by ISRPL from its employees for the purpose of employment and recording their attendance, etc. or from suppliers or onsite consultants for availing their services.

You will at all times have the option of not providing ISRPL with PI/SPDI that ISRPL seek to collect. Even after you have provided ISRPL with any PI/SPDI, you will have the option to withdraw the consent given earlier. In such cases, ISRPL will have the right to not provide or discontinue the provision of any service that is linked with such PI/SPDI.

7. WHY ISRPL COLLECTS DATA SUBJECT’S INFORMATION [PURPOSE]

ISRPL uses the Information to conduct its business and to provide Data Subject with the best possible services/products. ISRPL will only use the Information based on this Privacy Policy, its understanding with the Data Subject, or as required by law.

ISRPL will collect adequate, relevant and necessary Information and will process such Information fairly and lawfully for the purpose it is collected. Most commonly, ISRPL will use the Information in the following circumstances:

- (a) Where ISRPL needs to perform the obligations it has promised the Data Subject, such as to provide a service or product to the Data Subject and to enable the Data Subject's use of ISRPL's products/services, including but not limited to dealing with enquiries and complaints made by or about the Data Subject relating to services/products provided by ISRPL and to improve and customize ISRPL's services/products in accordance with the Data Subject's preferences;
- (b) Where ISRPL needs to comply with a legal, accounting, business or reporting obligation, including compliance with requests from the Government of India or any Governmental Agency;
- (c) To send marketing as well as non-marketing commercial communications to the Data Subject;
- (d) To send the Data Subject notifications that the Data Subject has specifically requested for as well as to send statements, invoices and payment reminders to the Data Subject, and to collect payments from the Data Subject;
- (e) To provide Third Parties with statistical information about its customers but those Third Parties will not be able to identify any individual from that information;
- (f) To keep ISRPL's website and other systems secure and to prevent fraud;
- (g) To manage the employment of the data subject with ISRPL.

ISRPL collects and processes the Information only when it is essential to offer its services/products to the Data Subject. By providing his or her Information, the Data Subject agrees that ISRPL may collect, use and share this Information with Third Parties for the purposes mentioned above from 7[a] to 7[g].

8. FAILURE TO PROVIDE INFORMATION

ISRPL may not be able to perform the obligations it has promised the Data Subject, or ISRPL may be prevented from complying with its legal, accounting, business or reporting obligations if the Data Subject fails to provide certain Information when requested by ISRPL.

9. CHANGE OF PURPOSE

ISRPL will only use Data Subject's Information for the purposes for which ISRPL collected it, unless ISRPL reasonably considers that it needs to use it for another reason and that reason is compatible with the original purpose.

10. CONSENT

Data Subject agrees that ISRPL does not need any additional or further consent from him/her to use the Data Subject's Information in accordance with this Policy to carry out ISRPL's legal obligations or exercise specific rights.

11. SHARING OF INFORMATION

To the extent necessary to provide you the requested Services & products or to the extent required under applicable law, ISRPL may provide your PI/SPDI to the Third Parties like Consultants (including auditors, authorized vendors), Governmental authorities without notice to you.

12. TRANSFER OF INFORMATION OUTSIDE INDIA

Unless stated otherwise, ISRPL stores and processes the Information in India. There may, however, be occasions when ISRPL needs to transfer the Information outside India for its business requirements. In such instances, ISRPL will exercise the same level of care in handling the Information as it does in India.

13. SECURITY OF INFORMATION

The Information is processed by ISRPL in strict accordance with the Indian Information Technology Act, 2000, and the rules notified thereunder. ISRPL implements and maintain 'Reasonable Security Practices and Procedures' as stated in the Indian Information Technology Act, 2000 and the Information Technology Rules, 2011, while processing, collecting, storing or handling any Information.

14. REVIEW OF INFORMATION

You may review the Information you have provided to ISRPL at any time. On your request through the Grievance Officer whose details are provided herein below, ISRPL will ensure that any PI/SPDI notified to be inaccurate or deficient, shall be corrected or amended.

ISRPL shall not be responsible for the authenticity of the PI/ SPDI.

15. RETENTION AND REVOCATION OF INFORMATION

ISRPL will only retain PI/SPDI for as long as necessary to fulfil the purposes ISRPL collected it for, including for the purposes of satisfying any legal, business, accounting, or reporting requirements.

In some circumstances, ISRPL may anonymize the Information so that it can no longer be associated with the Data Subject, in which case ISRPL may use such information without a further

reference to Data Subject.

16. NOTIFICATION OF CHANGES

From time to time, ISRPL may update this Privacy Policy and same will be published on official website.

17. GRIEVANCE OFFICER

In accordance with the Information Technology Act, 2000 and the rules made thereunder, the name and contact details of the Grievance Officer are provided below. You may contact the Grievance Officer to address any discrepancies and grievances you may have with respect to your Information with ISRPL. The Grievance Officer will redress your grievances expeditiously.

Name – Mr. Amit Vohra

Designation – Head Legal & Company Secretary

Contact Number: +91 9810182553

Email ID: amit.vohra@isrpl.co.in

ISRPL shall not be held liable in any manner whatsoever if ISRPL is unable to perform its services or if there is a deficiency in its services to Data Subject due to Data Subject's withdrawal of consent.

ISRPL and/or its Agents, employees, directors, associates, etc. shall be indemnified by the Data Subject and held harmless from any complaints, legal proceedings or claims filed or initiated by the Data Subject or any Third Party against ISRPL in this regard.

ACCELERATING GROWTH, BINDING TRUST