

Privacy Policy

In accordance with Rule 4 of Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 under the Information Technology Act, 2000.

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1. Objective

The purpose of the Policy is to set out the duties of the Company i.e. **THE INDIAN STEEL & WIRE PRODUCTS Ltd.** and its personnel when they are processing personal data about individuals and describe the rights of the individuals whose personnel data is processed by the company.

The purpose of the Privacy policy is to balance the government's need to maintain information about individuals with the rights of individuals to be protected against unwarranted invasions of their privacy stemming from federal agencies' collection, maintenance, use, and disclosure of personal information about them.

2. Scope

The Policy is applicable on

- All the employees working within the Indian Steel & Wire Products Ltd.
- Any person who in its due course provides any information to the Company such as visitors, contract workers, supplier contracts, website users, and shareholder etc.
- The policy lays down the manner in which company collects, uses, holds, transfer and processes the sensitive information provided.
- The policy also seeks to ensure that the personnel providing the sensitive information understands the protection provided for storage and use of such sensitive information.

Effective Date

This policy will be effective from September 01, 2016.

3. Definition

“Personal information” 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.

“Sensitive personal data or information” of a person means such personal information which consists of information relating to:

- i. Bank Account information and other financial information such as credit card or debit card or other payment instrument details ;
- ii. Income tax returns;
- iii. password;
- iv. physical, physiological and mental health condition;
- v. sexual orientation;
- vi. medical records and history;
- vii. Biometric information;
- viii. any detail relating to the above clauses as provided to body corporate for providing service; and
- ix. any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.

4. Policy Details

THE INDIAN STEEL & WIRE PRODUCTS Ltd is committed to protect your personal information including sensitive personal data or information. We have created this Privacy Policy to help you understand how we handle and deal with the above referred information.

1. Types of data collected and purpose of collection

We collect your bank account information which comes under the definition of sensitive personal data or information and is classified under financial information. The bank account information is collected for the purpose of timely disbursement and remittance of your salary. We also collect and retain your income tax return proofs which may be necessary for computation and deduction of taxes. Any other information obtained such as past employment details - salary slip, appointment letter and other personal information that we collect from you is held in accordance with applicable laws and regulations in India.

2. Disclosure and transfer of Personal Information including Sensitive personal Data or Information

We may disclose your personal information including sensitive personal data or information to third parties for processing of such information and for other lawful purposes. We may also transfer your sensitive personal data in case of bankruptcy, merger and or in the event of sale.

We may share your personal information including sensitive personal data or information, with government agencies mandated under law to obtain personal information including sensitive personal data or information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, or where disclosure is necessary for compliance of a legal obligation. Also any personal information including sensitive personal data or information may be required to be disclosed to any third party by us by an order under the law for the time being in force.

To protect the vital interests of the individual concerned in emergency situations.

Transfer of information- The company will not transfer sensitive personal data or information to entities outside the company within the country or outside for further processing unless such entities agree to abide by a data privacy standard [Only if they are following International Standards IS/ISO/IEC 27001 or at least as high as the regulations under Indian Law]

3. Reasonable security practices and procedures: Protection of your personal information including sensitive personal data or information

We shall take reasonable steps to ensure that the personal information including sensitive personal data or information pertaining to you is stored in a secure environment protected from unauthorized access, modification or disclosure.

- We maintain personal information including sensitive personal data or information pertaining to you in our business records as per current regulatory requirements.
- We shall retain your personal Information including sensitive personal data or information till the subsistence of your employment with The Indian Steel & Wire Products Ltd. or otherwise required under law.
- We have a documented IT Policy which has encompassed the following areas:
 - i. Access to the IT facilities
 - ii. Security of Computers and network.

In case of any privacy related concerns, feedback or grievance, you can contact: **Mr. AMARVEER SINGH** who is the Grievance Officer and can be contacted on amarveer@iswp.co.in.

4. Review and updating of Personal Information including sensitive personal data or information

We strive to keep our records updated with your latest information. To this end, if you see any discrepancy in your personal information including sensitive personal data or information or if a part of your personal information including sensitive personal data or information changes, we request you to get in touch with **Human Resource Department**

5. Changes to our Privacy Policy

We reserve the right to update this Policy as necessary from time to time. Please check our Knowledge Management Portal periodically for changes to this Privacy Policy.

6. COMPANY'S RESPONSIBILITY

- i. The company shall obtain consent in writing from the provider of the sensitive information.
- ii. The company shall ensure that the provider of the information has knowledge of:
 - a) That the information is collected
 - b) The reason for which the information is being collected
 - c) The intended recipients of the information.
 - d) The name and address of the department/personnel collecting the information and who are entrusted to retain the information collected from the individuals.
- iii. The company shall ensure to take prior approval from the provider of the sensitive information in cases where the provided sensitive information is going to be used in a new way, or for a different purpose.

7. EMPLOYEE'S RESPONSIBILITIES

- i. Employees may not use or disclose any confidential company, client, or third party information to anyone outside the company except as authorized.
- ii. The employees shall use the confidential information for specified purposes only and shall continue to adhere to the confidentiality obligations even after the termination of their relationship with the company.

8. INDIVIDUAL'S RIGHT

- i. The company will give right to access – on written request from any individual, the company should verify whether the company possess sensitive information about such individual or not, and should intimate the same to him/her, describe the sensitive information it holds and the reason for holding the said data.
- ii. The company shall prior to the collection of the sensitive information provide an option to the provider of the information to not to provide the data or information sought to be collected.
- iii. The provider of the information at any time while availing the services or otherwise, also have an option to withdraw his/her consent given earlier.
- iv. The procedure of such withdrawal should be specified addressing the name of the person to whom it should be intimated.

9. GRANTING OF ACCESS TO COMPANY INFORMATION TO THE EXTERNAL PERSONNEL

- i. The external personnel shall be granted access to company information specifically in consonance with the terms of the contract entered with them. The Company shall endeavor to enter into a Non-Disclosure Agreement with such personnel for sharing any sensitive personal information of its stakeholders.
- ii. The term "External personnel" includes, but not limits to, vendors, regulatory bodies, banks and financial institutions, etc.
- iii. The company shall ensure to take prior approval from the provider of the sensitive information in cases where the provided sensitive information is going to be used in a new way, or for a different purpose.

10. Document History

Date	Version	Author	Description
1-08-2016	0.1	Amarveer Singh	
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Revision History

Date	Version	Author	Description

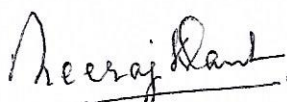
Reviewed By

Date	Name

References

Document Title	File Name

Approved By

Organization	Person Name & Signature
The Indian Steel And Wire Products Ltd.	 Neeraj Kant Managing Director