



**MINDTECK (INDIA) LIMITED
GLOBAL DATA PRIVACY POLICY**

Version	Created By	Checked By	Approved By	Date of Approval
Version 1	Arunkumar & Sathya Raja G	Shivarama Adiga, VP Legal & CS	Board of Directors	14-08-2018

Global Data Privacy Policy:

This Policy has been framed pursuant to GDPR requirements and data privacy compliances by Mindteck and its group companies. The prescribed norms to be followed by the company in this regard are described hereinafter:

1. Policy Statement

Mindteck is committed to protecting the privacy and confidentiality of Personal Information about its employees, customers, business partners and other identifiable individuals. Mindteck's policy, guidelines and actions support this commitment of protecting Personal Information. Each employee bears a personal responsibility to comply with this Policy in fulfillment of their responsibilities at Mindteck.

2. Policy Principles

Article 5 of the GDPR requires that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and



- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

In addition, there is a requirement that:

The controller shall be responsible for, and be able to demonstrate, compliance with the principles.

3. Scope

This Policy sets the minimum standard and shall guide all employees and consultants of Mindteck even if local law is less restrictive. Supplemental policies and practices will be developed as needed to meet the local legal or departmental requirements. Supplemental policies and practices may provide for more strict or specific privacy and protection standards than what has been set forth in this Policy.

4. Definitions

“Agent” means any third party that collects and/or uses Personal Information provided by Mindteck to perform any task on behalf of and under the instructions of Mindteck.

“Controller” means a person or an organization which, alone or jointly with others, determines the purposes and means of the Processing of Personal Information.

“Data Processing” or “Process” means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Human Resource Data” means Personal information concerning employees or prospective employees of Mindteck.

“Identified” or “Identifiable” individual means a person, who could be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person’s physical, physiological, mental, economic, cultural or social identity.

“Mindteck” means Mindteck (India) Limited and all of its subsidiaries and affiliates globally.

“Personal Information” means any information or data about an Identified or Identifiable natural person’s name and his street address, telephone number, e-mail address, photograph, social security number or tax identification number, driver’s license number, passport number, credit card number, bank information, customer id or account number, biometric identifiers (including without limitation video or photographic images, fingerprints, and voice biometric data), health-related information or data, account password or answers to account security questions, or any other piece of information that allows the location of, identification of, or contact of a natural person; or any other information if such information is defined as “personal data”, “personally identifiable information”, or “personal information.”



“Policy” means this Global Data Privacy Policy, as revised or amended from time to time.

5. Policy Details

5.1 Mindteck respects the data privacy of its employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates called for employment and recognizes the need for appropriate protection and management of Personal Information. Mindteck is guided by the following principles in Processing Personal Information:

- Notice
- Choice
- Accountability for onward transfer
- Security
- Data integrity and purpose limitation
- Access
- Recourse, Enforcement and Liability

5.2 Notice: When collecting Personal Information from individuals, Mindteck shall provide clear and appropriate notice about the:

- Purpose for which it collects and the usage of the Personal Information,
- Type of third parties to which Mindteck may disclose that information, and
- Type of governance, Mindteck offers to its employees for limiting the usage and disclosure of such Personal Information.

5.3 Choice: Mindteck informs to individuals, how it would process personal information, including the opportunity to choose or opt-out or opt-in further processing in certain circumstances. Except for legal reportings, the explicit consent from individuals shall be obtained, when processing personal information for:

- the purpose for which it was originally collected or subsequently authorized by the individual,
- the purposes necessary to carry out a transaction relationship,

5.4 Accountability for Onward Transfer: Mindteck shall take reasonable and following appropriate steps before transfer of Personal Information to any third party:

- Transfer such Personal Information only for specified purpose and restrict the third party’s use of that information only for such specified purposes;
- Make it mandatory to the third party that it shall provide at least the same level of privacy protection in terms of this Policy;
- Ensure that the third party effectively processes the Personal Information in a manner consistent with its obligations under this Policy;
- Ensure that the third party shall mandatorily notify Mindteck, if the third party determines that it could no longer meet its obligation to provide the same level of protection as required by this Policy;
- Upon notice from the third party, take such further steps promptly to stop and prevent any unauthorized Processing;



- Maintain proper documentation for various types of personal information processed by the Mindteck.

5.5 Security. Mindteck shall take reasonable and appropriate measures to protect Personal Information from loss, misuse, unauthorized access, unauthorized disclosure, alteration or destruction, considering the risks involved in the processing and the nature of the personal information.

5.6 Data Integrity and Limitation. Mindteck shall process personal information only in the way that is compatible with the purpose for which it has been collected or subsequently authorized by the individual. Mindteck shall take steps to ensure that personal information is accurate, reliable, current and relevant to its intended use, for which it was collected.

5.7 Access. Mindteck provides individuals a reasonable access to their personal information for the purpose of correcting, amending or deleting when it is found inaccurate or has been processed in violation of the Mindteck data privacy principles.

5.8 Recourse, Enforcement and Liability. Violation of this policy by an employee or a contractor or a consultant of Mindteck, shall amount to appropriate disciplinary action. Violation by any third party, of this Policy or Mindteck's privacy requirements, shall amount to appropriate legal remedies, including termination of any contract with them for material breach of contract.

6. Purpose of Collecting and Use of Personal Information

6.1 Mindteck may from time to time process certain personal information from or about employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates for employment, including information recorded on various media as well as electronic platform.

6.2 Mindteck may provide such personal information to its customers, business partners, vendors, service partners and suppliers in the process of its business. Mindteck uses such information in order to complete a transaction or obtain or deliver an order, facilitate a communication, market or sell its products and services or deliver products/services or to bill any purchase of products/services, and to provide ongoing service and support. Occasionally Mindteck personnel may use personal information to contact customers, business partners, vendors, service partners and suppliers to complete survey that are used for marketing and quality assurance purposes.

6.3 Mindteck may also share personal information with its business partners, vendors, service providers and suppliers to the extent needed to support Mindteck's business needs. Suppliers shall be advised to keep confidential any personal information received by it from Mindteck and shall not use it for any purpose other than as originally intended or subsequently authorized or permitted.

6.4 Mindteck also collects personnel information in connection with administration of its human resources programs and functions and for the purpose of communicating with its employees. These programs and technical functions may include compensation benefit programs, employee development planning, employees review, performance appraisals, training, business travel expense and tuition reimbursement, identification cards, access Mindteck facilities and computer networks,



employee profiles, internal employee directories, for which human resource department shall maintain such records and other employment related matters. The personal information collected by Mindteck to consider a candidate for employment opportunities within Mindteck shall be secured. Human resources data may be shared with third party vendors and service providers for the purpose of enabling the vendor or service provider to provide service and/or support to Mindteck in connection with these human resources programs and functions. Mindteck shall not share human resources data with any third parties for non-employment related purposes. Mindteck ensures that third parties receiving personal information shall apply the same level of privacy protection as contained in this Policy and as required by applicable law.

7. Administration

7.1 Roles and Responsibilities. Responsibility for compliance with this policy rests with the functional heads of the respective individuals. The business units and departments together with any individual employees collecting, using or otherwise processing personal information, is responsible for implementing further standards, guidelines and procedures to uphold this policy and for assigning day-to-day responsibilities for the protection of privacy to specific personnel for the purpose of enforcement and monitoring.

7.2 Implementation. This policy shall be implemented in conjunction with supplementary data privacy policies, specific to a region if any. These supplementary data privacy policies will account for differences in data protection requirements by jurisdiction or function and will specify individual roles and responsibilities. Mindteck business units, functions or facilities will implement supplementary data privacy policies as required by applicable laws.

7.3 Interpretation. In the event of any conflict between this policy and any supplemental data privacy policy, this policy shall supersede the supplemental data privacy policy to the extent that the supplemental data privacy policy is less restrictive. Local data privacy policies may provide for stricter data privacy and protection standards than are set forth in this Policy. In the event local data privacy law provides for stricter data privacy and protection than this Policy, the local data privacy law shall supersede this policy in that jurisdiction to the extent necessary to comply with stricter local law.

8. Authorized Representative of the Company

Any misuse, misconduct or breach of this policy shall be intimated to Data Protection Officer or Compliance Officer through <<email id>> and may also contact +91 8041548013 for any queries with respect to the data privacy policy.

9. Amendments

No amendments to this policy shall be valid until the same is approved by the Board