

ruhlat Automation Technologies (India) Pvt. Ltd

DATA PRIVACY POLICY

Last updated: 27 June 2024

1. Background

This privacy notice (**Privacy Notice**) governs the collection, use, disclosure, transfer, retention or otherwise processing of your personal data (sometimes also known as personal information) (collectively, **Information**) by ruhlat Automation Technologies (India) Pvt. Ltd. (**us, we, our, Company**). This Privacy Notice shall be applicable to any person or entity (**you, your**) that accesses our website “www.ruhlat.co.in” (**Website**) or has shared any Information with us including the Company’s employees (including consultants and contract labour engaged by the Company).

When you access our website or communicate with us through email or other digital channels or otherwise, we may collect some Information from you. By accepting the terms of this Privacy Notice, you hereby expressly provide your consent to us for the collection, usage, disclosure, transfer, retention and otherwise processing of such Information in the manner outlined in this Privacy Notice.

We are committed to protecting the security of your Information and safeguarding your privacy and this Privacy Notice *inter alia* sets out and clarifies the following:

- What Information we collect;
- Why we collect such Information;
- How we use that Information and who we share the Information with;
- How we store such Information; and
- Your rights and options.

We value your privacy, and our organization is committed to safeguarding your Information and ensuring its security. Rest assured that we will handle your data with utmost care and respect.

In the event, that you do not agree with the terms of this Privacy Notice, you are requested by us to not use the Website and not share your Information with us.

2. The Information We Collect

We collect your Information when you access our website or communicate with us through email or other digital channels or when you are onboarded as an employee, consultant or contract labor with the Company. This Information may include personal information as defined under applicable Indian data protection laws. The Information we collect includes, but is not restricted to, the following:

- **Personal contact details such as name, title, addresses, telephone/mobile numbers and personal email addresses.**
- **Details of previous employers, Education Details, Information of dependents.**
- **Gender**
- **Natoinality**
- **Residence status**
- **Marital status.**
- **Religion**
- **Family Related Information.**
- **Details of previous employees.**
- **Education Details.**
- **Information on Dependents.**
- **Photographs.**
- **Personal ID's/Documents such as PAN, UAN, Aadhar, Passport, Driving License, electricity bills, Rent aggrement.**
- **Photographs.**
- **Financial details such as salary and income details (including bank accounts)**
- **Career management information, designation, contractual information, system and application access data, and device-related information.**
- **Performance-related information such as educational and professional qualifications, letters of application, resume / CV, or other provided documents, performance, and development reviews.**
- **Medical records and history & Blood group.**
- **Biometric Information**
- **Data collected while using the Website or any mobile applications: including data collected automatically such as device ID, IP Address, web browser type, page views, operating system, timing and frequency of use of the Website or application, application / website navigation.**

You may choose to provide your Aadhaar information to us for identification purposes. However, please note that this is not mandatory, and you may provide alternative identification documents such as Driver's license, PAN card, Voter's ID or passport. If you voluntarily choose to provide your Aadhaar information to us, you hereby expressly provide your consent to the collection and processing of your Aadhaar information by the Company for the purposes of identity verification and acknowledge that such Aadhaar information was voluntarily provided by you.

We limit the data collected to what is strictly necessary to complete the purposes provided below in Clause 3.

3. Use of Information

We may use your Information to achieve any of the following objectives:

- Managing our interactions with you, including concerning your employment or engagement with us and your access to our premises and assets;
- Facilitating communication with you (including in case of emergencies);
- To carry out compensation related-activities;
- To process remuneration;
- To carry out performance management, training & development;
- To provide you with entitlements, benefits and/or privileges, including health and medical benefits, leave entitlements, and bonuses;
- For the purpose of talent management, career development, engagement, and teambuilding (including special events), or operations management;
- To provide a secure and safe working environment, for example to create a security pass for identification purposes and entry into the building;
- To protect our legitimate business interests and legal rights;
- For operating and managing our business operations;
- Providing services to our clients;
- Displaying or communicating highlights of our work with our clients, whether on our website or to third parties;
- Complying with legal requirements worldwide and defending the Company's legal rights;
- Monitoring your use of our systems; and
- Conducting data analytics to improve the quality of our services and streamline internal processes.

In case we are required to process your personal information or Aadhaar information for a purpose not contemplated hereunder, we shall seek your consent.

We may also share your Information if we are acquired by or merged with another entity, in which case it would be ensured such entity offers equivalent level of protection for your Information.

Miscellaneous:

We may also use various categories of Information listed above, where necessary for one or more of the following purposes:

- To comply with the Company's legal obligations
- For the Company's internal business purposes listed below:
 - To communicate with you, such as to respond to and/or follow-up on your grievances, complaints, requests, inquiries, issues or feedback, and to provide customer service;
 - For marketing and promotional purposes.
 - To provide ancillary services.

- To conduct research and analytics.
- To assist in investigations or to substantiate legal claims, and for proceedings.

4. Your Rights

You have the right to:

- a. access and review the Information about the processing of your Information
- b. seek correction, completion, updating or erasure of your Information
- c. have your grievances resolved
- d. nominate another individual to exercise your rights in case of your death or incapacity.

A request for any of these rights should be directed towards the Grievance Officer (*whose details are mentioned below*) appointed by the Company.

If you have given your consent for the processing of your Information for specific purposes, you can withdraw this consent at any time by writing to the Grievance Officer. Please note however that this may affect our ability to process or enable communication with you and may lead to the discontinuation of our relationship for which this Information was being used at our sole discretion. In some cases, if we are not allowed to process your Information, we may need to terminate our relationship with you.

5. Our Security Practices

We have implemented reasonable security measures and appropriate technical and organizational measures in line with legally required standards.

We have put in place security practices and standards and have a comprehensive documented information security program and policies that contain managerial, technical, operational and physical security control measures to protect the security of your information.

Other entities will only process your personal information and SPDI on our instructions and where they have agreed to treat the information confidentially, legally and securely.

We have put in place appropriate security measures to prevent your personal information & SPDI from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information & SPDI to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information & SPDI on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

6. How we Store and Retain your Information

The Company will strictly control access to the Information and will review such access control from time to time. We will retain and use your Information until:

- (a) The purpose of processing such Information is achieved, and when the purpose is achieved, such Information will be removed from our systems or anonymized
- (b) erase your personal data if you withdraw your consent for the processing of such Information in accordance with your rights mentioned above.

The Company may retain the Information for a longer period if such retention is required by law.

7. How we Disclose / Transfer your Information

All Information that we collect is disclosed or transferred under the following circumstances, to the categories of entities identified below:

- Your Information may be disclosed or transferred to our corporate affiliates, including our parent company, affiliates and subsidiaries who need to know the Information for the purposes described in this Privacy Notice, to the extent applicable.
- Your Information may be disclosed and transferred to respond to law enforcement requests or where required to be provided under applicable laws, court orders, or government regulations
- Where we need to share your Information with any other third parties, we will obtain your consent before doing so.

8. Rights of Organization

If any user misuses or discloses any digital data or Information Organization has the right to take a legal action against that user.

9. Translation

This Privacy Notice is drafted in English and translations may be provided in other languages upon your request.

10. Amendments to this Privacy Notice

We may revise the Privacy Notice from time to time. Any such changes will be posted on our website. We may need your consent for material updates to this Privacy Notice.

We may not be able to separately notify you of the revisions each time we make them. We encourage you to check this page periodically for modifications or corrections to the Privacy Notice to understand how it affects the use of your Information. We will not be responsible for your failure to remain informed about such changes.

11. Grievance Officer

If you have any concerns or questions in relation to this Privacy Notice, you may address them to our Grievance Officer whose name and address are as follows:

Name: - Mr. Suhas Satpe

Mob. No: - 02135-679999 – Ext. No 219

E-Mail ID: - hr@ruhlamat.in

Postal address: - Plot No.E7/2,E Block,Chakan Industrial Area Phase III, Opposite to ARemond
Fastners Nighoje, M.I, D.C, Chakan,Pune, Maharashtra