TECHNOSPHERE INDIA PRIVATE LIMITED
Registered Address: Hinjewadi, Phase2, Pune, Maharashtra, India
CIN: CIN123456789

EMPLOYEE PRIVACY AND DATA PROTECTION POLICY

1. Purpose

This Policy is established to protect the privacy and personal data of employees and ensure that TechnoSphere India Private Limited ("the Company") complies with applicable data protection laws, including the Digital Personal Data Protection Act, 2023. It provides guidelines on the collection, use, storage, access, and processing of employee personal data to maintain confidentiality, security, and employee rights.

2. Scope

This Policy applies to all personal data of employees, contractors, consultants, and temporary staff held by the Company across all its operations and locations. It covers personnel records, electronic HR systems, payroll data, health records, and any other employee-related data collected during employment or recruitment.

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Sensitive Personal Data:** Special categories of data, including health, biometric, financial data, etc.
- **Data Processing:** Any operation performed on personal data including collection, storage, use, disclosure, or deletion.
- **Data Principal:** The individual to whom the personal data relates (employee).
- **Data Fiduciary:** The Company, which determines the purpose and means of processing personal data.

4. Principles of Data Protection

- **Lawfulness, Fairness, and Transparency:** Personal data will be collected and processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Data will be collected only for specific, legitimate employment-related purposes and not used beyond that.

- **Data Minimization:** Only necessary and relevant personal data will be collected.
- **Accuracy:** Reasonable steps will be taken to keep data accurate and up-to-date.
- **Storage Limitation:** Personal data will be retained only as long as necessary for legitimate purposes and statutory requirements.
- **Security:** Appropriate technical and organizational measures will safeguard personal data against unauthorized access, loss, destruction, or alteration.

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5. Consent and Employee Rights

- Employees will be informed about the types of personal data collected, purposes for processing, and their individual rights.
- Consent will be obtained for processing sensitive personal data.
- Employees have the right to access, correct, or request deletion of their personal data within legal and operational limits.
- Special protections apply for data of minors or persons with disabilities, requiring parental or guardian consent where applicable.

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6. Access Controls and Confidentiality

- Access to personal data will be restricted to authorized personnel on a need-to-know basis.
- All employees and contractors handling personal data are required to maintain confidentiality and comply with this Policy.
- Data sharing with third-party service providers will follow strict contractual and regulatory safeguards.

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7. Data Breach Management

- Any suspected or actual data breach involving employee data must be reported immediately to the Data Protection Officer (DPO).
- The Company will investigate and notify affected employees and regulators as applicable within 72 hours as per DPDP Act guidelines.
- Corrective actions will be taken to mitigate risks and prevent recurrence.

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8. Data Protection Officer (DPO)

- The Company has appointed a Data Protection Officer responsible for overseeing data protection strategy and compliance.
- Contact details of the DPO will be shared with all employees.

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9. Training and Awareness

- Regular training programs will be conducted for employees and relevant stakeholders to ensure understanding and compliance with data protection requirements.

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10. Policy Review

This Policy will be reviewed annually or as mandated by changes in applicable data protection laws or Company procedures.

Approved by: Board of Directors
Effective Date: Jan 2025

Review Date: Jan 2025