



## **SPECTRON**

### **Data Sharing & Data Protection Policy**

**Date:** 05.01.2026

**Revision:** 01

**Approved By:** Management

**Applicability:** All eligible employees across functions and locations

#### **1. Purpose**

The purpose of this policy is to ensure lawful, fair, and secure handling of personal, confidential, and business data, and to define clear rules for **data protection, access, usage, storage, and sharing** in line with applicable laws and Company standards.

#### **2. Scope**

This policy applies to:

- All employees and management
- Contract staff, consultants, interns, and trainees
- Vendors, service providers, and third parties handling Company data
- All forms of data—physical, digital, verbal, or electronic

#### **3. Legal Framework**

This policy is framed in accordance with:

- **Information Technology Act, 2000**
- **Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011**
- **Digital Personal Data Protection Act, 2023 (DPDP Act)**
- Applicable contractual and regulatory obligations

In case of conflict, **statutory provisions shall prevail.**

#### **4. Definitions**

##### **Personal Data**

Any data that identifies or relates to an individual, including but not limited to:

- Name, address, contact details
- Aadhaar, PAN, bank details

## **SPECTRON ENGINEERS PRIVATE LIMITED**

*An ISO 9001 : 2015 Certified Company*

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- Employment, payroll, and attendance records

### Sensitive / Confidential Data

- Financial data
- Health and medical information
- Biometric data
- Login credentials
- Company trade secrets and proprietary information

### Data Principal

An individual to whom the personal data relates.

### Data Fiduciary

The Company, which determines the purpose and means of processing personal data.

## 5. Data Collection Principles

The Company shall ensure that:

- Data is collected for **legitimate and lawful purposes**
- Only **minimum necessary data** is collected
- Data is collected with **consent or legal authority**
- Data is accurate and kept up to date

## 6. Data Usage & Access Control

- Data shall be accessed strictly on a **need-to-know basis**.
- Unauthorized access, copying, or sharing of data is prohibited.
- Employees must use Company data **only for official purposes**.

## 7. Data Sharing Policy

### Internal Data Sharing

- Data may be shared internally between departments strictly for official and operational needs.
- Access shall be role-based and approved by authorized personnel.

### External Data Sharing

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Data may be shared with third parties only when:

- Required by law or statutory authority
- Necessary for business operations (e.g., payroll processors, auditors, insurers)
- Covered under contractual confidentiality and data protection clauses

Unauthorized sharing with external parties is strictly prohibited.

### 8. Data Storage & Retention

- Data shall be stored securely in physical or electronic form.
- Reasonable security practices such as passwords, access control, encryption, and backups shall be implemented.
- Data shall be retained **only for the period required** for legal, contractual, or business purposes.
- Upon expiry of retention period, data shall be securely deleted or destroyed.

### 9. Data Protection & Security Measures

The Company shall implement reasonable security safeguards, including:

- Password protection and access controls
- Secure servers and systems
- Periodic system reviews
- Restricted access to sensitive data

Employees are responsible for safeguarding data accessed by them.

### 10. Employee Responsibilities

Employees must:

- Protect Company and personal data from unauthorized access
- Not share passwords or credentials
- Report any suspected data breach immediately
- Follow Company IT and information security guidelines

### 11. Data Breach Management

- Any actual or suspected data breach must be reported immediately to Management or IT/HR.
- The Company shall investigate the incident and take corrective action.

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- Where required, statutory authorities and affected individuals shall be informed as per law.

### **12. Rights of Data Principals**

As per applicable law, individuals have the right to:

- Access their personal data
- Seek correction or deletion
- Withdraw consent, where applicable
- Raise grievances relating to misuse or breach

Requests shall be handled through HR or the designated authority.

### **13. Non-Compliance & Disciplinary Action**

- Violation of this policy may result in disciplinary action, including termination.
- Serious breaches may attract civil or criminal liability under applicable laws.

### **14. Training & Awareness**

- Periodic awareness may be conducted on data protection and security.
- Employees are expected to stay informed and compliant.

### **15. Policy Review & Amendment**

The Company reserves the right to amend, modify, or withdraw this policy to align with legal developments, technology changes, or business requirements.

#### **Employee–HR Communication on Data Sharing & Protection**

**Employee:** What kind of data does this policy protect?

**HR Representative:** It covers personal data, sensitive information, and confidential Company data in any form—digital or physical.

**Employee:** Can I share employee or client data with external parties?

**HR Representative:** No. Data can be shared externally only if it is legally required or officially approved and covered by confidentiality agreements.

**Employee:** What should I do if I suspect a data breach?

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**HR Representative:** You must immediately report it to HR or IT. Prompt reporting helps us contain and address the issue effectively.

**Employee:** Thank you. This clarifies our responsibilities.

**HR Representative:** You're welcome. Data protection is a shared responsibility, and compliance is essential.

Yours Sincerely,

For **Spectron Engineers Pvt. Ltd.**



**Authorised Signatory**

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