



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

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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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