BLAZECLAN TECHNOLOGIES PVT. LTD.

Data Retention Policy
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A	1st November 2022	All Sections	Susmita Kaushik	Sanjay Bhat	Varoon Rajani	First Issue

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Scope

- This Policy sets out the type(s) of Personal Data held by Blazeclan in its various capacities, the duration for which it is required to hold such Personal Data, and when and how it is to be deleted or otherwise disposed of and the stake holders responsible for carrying out such activities.
- This Policy is also for the purpose of aiding clanmates in understanding their obligations in retaining electronic documents - including e-mail, Web files, text files, sound and movie files, PDF documents, and all Microsoft Office or other formatted files.
- This Policy applies to all Personal Data held by Blazeclan and by third-party data processors processing Personal Data on Blazeclan's behalf.
- Personal Data, as held by Blazeclan is stored in the following ways and in the following locations:
  a) Third-party cloud servers used/ hired by Blazeclan such as Zoho Platforms;
  b) Computers permanently located in all Blazeclan's premises.
  c) Laptop computers and other mobile devices provided by Blazeclan to its employees.
  d) All Personal Data held by Processors / Sub Processors appointed by Blazeclan anywhere.

Important terms

- "**Personal Data**" – means any data which directly identifies or along with other information can identify a natural person. Such data may include names, addresses, email addresses, telephone numbers, (health and medical information of end users of our clients) gender, location information such as IP address. This information may relate to employees, suppliers, end-users etc (of BlazeClan's clients or their customers) or any third party.

- "**PICPD**" means a Person In-Charge of the Personal Data of each project/department and will monitor the data Processing activities.

- "**Controller**"- is a natural person or a legal entity such as a company, which determines the purposes and means of the processing of Personal Data.

- "**Processor**"- is a natural person or a legal entity such as a company, processes personal data on behalf of the controller.

- "**Processing**" means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- "**Sub Processor**" is a natural person or a legal entity such as a company, processes personal data on behalf of the controller.

- Blazeclan in different roles for better understanding of the aforementioned terms, this section seeks to illustrate when Blazeclan will be a Controller, a Processor or a Sub Processor.

    a) **Controller**- When Blazeclan directly collects, stores or otherwise Processes Personal Data it would be a controller. For example- when persons contact Blazeclan through Blazeclan's website and they provide their name, email id etc,
    b) **Processor**- When Blazeclan is required to utilize, organize, access, Personal Data as part of its products and services offerings to its client, in such cases Blazeclan would be termed as a Processor. In certain cases, in the capacity of a Processor, Blazeclan may appoint a Sub Processor for Processing Personal Data, such as when it stores certain Personal Data provided by Blazeclan' s Client on third party cloud server.
    c) **Sub Processor**- If one of Blazeclan' s clients is required by its customers to Process certain Personal Data, and Blazeclan too is required to Process such Personal Data as part of its services to such client under its directions; Blazeclan then would be a Sub Processor.

Data Retention

- As stated above, and as required by the various privacy laws worldwide, Blazeclan will not retain any Personal Data for any longer than is necessary considering the purpose(s) for which that data is collected, held, and processed.

- Different types of Personal Data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below in project / department specific Data Retention Schedule (as per the template contained in Schedule A of this policy).

- The Person in Charge of Personal Data ("PICPD") of each project / department will be in-charge of having the Data Retention Schedule prepared after consultation with the relevant members of the project/ department.

- When establishing and/or reviewing retention periods, the following must be considered by the PICPD:

    a) The capacity in which Blazeclan holds/ Processes such Personal Data; i.e. whether Blazeclan holds or Processes such Personal Data as a Controller, Processor or a Sub Processor;
    b) The type of Personal Data in question;
    c) The purpose(s) for which the Personal Data in question is collected, held, and Processed;

    d) BlazeClan' s legal basis for collecting, holding, and processing that Personal Data;

    e) The category or categories of individuals to whom the Personal Data relates.

- Notwithstanding the following defined retention periods, certain Personal Data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the top management of Blazeclan zzzdto do so (whether in response to a request by an individual or otherwise). For the purposes of making such decision however, the concerned PICPD and the process owner will be consulted.

Data Erasure

- As required under the applicable privacy laws the Personal Data needs to be erased upon

    a) expiry of the data retention period as per the data retention policy,

    b) request received by an individual,

    c) the Personal Data is no longer necessary in relation to the purpose for which they were collected

    d) to comply with legal obligations/court orders/request by Govt. authorities.

Data Disposal - Triggers

- The trigger events for destruction/ deletion of Personal Data are as follows (whichever is earlier):

    a) When the project is completed.

    b) Period of retention specified in the retention schedule (as per format in Schedule A) has expired.

    c) Where Blazeclan is a Data Controller and Individual has made a direct request for deletion (for website related data);

    d) Where Blazeclan is a Processor or a Sub Processor, it will co-ordinate with the Controller to determine the appropriate course of action in the following cases-

- After 4 to 6 months from the date of termination of the agreement as executed between Blazeclan and its client pertaining to the services provided by Blazeclan.
- If individual has made a request to Blazeclan. In such cases Blazeclan must forward the request to the Controller.
- If Blazeclan' s client (Controller) has received a request from the Data Subject and in turn Blazeclan' s client has made a demand to Blazeclan.

- The PICPD as may be specified in the Department/ Project specific Data Retention Schedule must oversee determining whether a trigger event has occurred or not.

If there is any confusion or doubt as to whether a trigger event has occurred, the PICPD must consult with the process owners.

Data Disposal- Methods

- Upon the happening of any of the trigger events specified in the "Data Disposal Triggers" the Personal Data must be deleted, destroyed, or otherwise disposed of as follows under the supervision of the process owner:

    a) Personal Data stored electronically (including any and all backups thereof) must be deleted securely;
    b) Special category of Personal Data if any (such as genetic information, biometric, health or financial information of an individual) stored electronically (including any and all backups thereof) must be deleted securely;
    c) Personal data stored in hardcopy form must be shredded;
    d) Special category of Personal Data as described above, stored in hardcopy form must be shredded;
    e) If Blazeclan being a Data Processor receives any request from individuals to erase or destruct their data, Blazeclan will co-ordinate with its client (the Data Controller) for taking the necessary steps.

- Processor or a Sub Processor appointed by Blazeclan-

    a) If Blazeclan has appointed a Processor or a Sub Processor for any specific Personal Data, the process owner will need to instruct the Processor or a Sub Processor to delete/ destroy such Personal Data and to confirm in writing that the same has been done;
    b) Even if the Data Disposal Trigger events have not been achieved, but the services of the Processor or a Sub Processor appointed by Blazeclan have been completed or terminated, the PICPD/process owners will instruct the Processor or Sub Processor to delete/ destroy such Personal Data and to confirm in writing that the same has been done.

Roles and Responsibilities

PICPD

    a) Each Department/Project head will be the person appointed as a PICPD;
    b) The PICPD will be in charge of identifying the Personal Data being handled by the specific department and prepare the requisite Data Retention Schedule as per the template provided in Schedule A;
    c) The PICPD will also determine the manner in which the Personal Data is maintained, accessed and shared;
    d) The members of the Department / Project will be responsible for informing the PICPD as and when they believe a Data Disposal Trigger event has been

achieved. The PICPD must assess the situation and determine whether such trigger event has been achieved.

Data Duplication

Blazeclan will ensure and take active steps that there will be no data duplication during the data retention period.

Annexure A: Data Retention Schedule

Sr. No	Data	Retention period	Reasons for Data Retention	PICPD
1	PII data by the PEx Team [Stored on third party platform – Zoho People]	Minimum period of 3 years	Maintaining attendance records, and payment of salaries, the data is required for internal compliance, and record keeping	Susmita Kaushik
2	Candidate Resume and personal details [Stored on third party platform – Zoho Recruit]	6 months to 12 months from last interaction	Retained for future recruitment purposes.	Shoaib Shah
3	Employee related Financial Data like Form 16s, Investment Proofs etc. [Stored on third party platform – Paysquare, Zoho Expense]	8 years	Taxation purpose and financial record keeping.	Smita Kadam
4	Employee related laptop backups etc. which may contain personal data too [Internal and Third-party vendor]	1 or 2 months after the employee has ceased to work with Blazeclan	Business continuity and security purposes	Anurag Kumar

5	Customer Data	4 to 6 months after termination or as per customer contractual obligations	Business continuity and as per customer requirements	Sanjay Bhat/SUHs