

Vacmet India Limited

PRIVACY POLICY

1. Purpose and Scope

We, Vacmet India Limited (“**the Company**”), respect the privacy of individuals and have implemented reasonable security practices and procedures that are commensurate with the information assets being protected and with the nature of our business. The purpose of this privacy policy (“**Policy**”) is to set out the process and the framework within which the Company collects, receives, stores, deals or handles Personal Information including Sensitive Personal Data or Information.

In this Policy, unless the context otherwise requires:

- i. ‘**Personal Information**’ means any information that relates to a natural person which, either directly or indirectly, in combination with other information available or likely to be available with the Company, is capable of identifying such person.
- ii. ‘**Sensitive Personal Data or Information**’ of a person means such Personal Information which consists of information relating to:
 - password;
 - financial information such as bank account or credit card or debit card or other payment instrument details;
 - physical, physiological and mental health condition;
 - sexual orientation;
 - medical records and history;
 - biometric information;
 - any detail relating to above clauses as provided to the Company for providing service; and
 - any of the information received under any of the above Clauses by the Company for processing, stored or processed under lawful contract or otherwise:

Provided that any information that is freely available or accessible in public domain or furnished under the Right to Information Act 2005 or any other law for the time being in force shall not be regarded as Sensitive Personal Data or Information.

- iii. The words and expressions used in this Policy but not defined herein but defined in the Information Technology Act 2000 (“IT Act”) or the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011 (“IT Rules”) shall have the meanings assigned to them thereunder.

2. Collection of Personal Information

- i. The visitors to the Company’s website can access the website’s home page and browse some areas of the website, without disclosing any Personal Information or Sensitive Personal Data or Information.
- ii. The Company tracks information provided by visitor’s browser, including the website the visitor came from (known as the referring URL), the type of browser used and other information that does not personally identify any visitor of the Company’s website. The Company may collect information (which may include Personal Information and / or Sensitive Personal Data or Information) in order to enable the secure online interaction and transaction with natural persons. This may include installation of cookies and collection of other session data.
- iii. The Company also collects Personal Information (which may include Sensitive Personal Data or Information) that is voluntarily provided to it for its business and through responses to job postings, queries, complaints, feedback, etc.

3. Use and Processing of Personal Information (including Sensitive Personal Data or Information)

The Personal Information (including Sensitive Personal Data or Information) collected by the Company may be used for various legitimate business and/ or regulatory purposes.

4. Disclosure and transfer of your Sensitive Personal Data or Information

- a. The Company may need to disclose/ transfer Sensitive Personal Data or Information to its service providers or business partners, during the normal course of business, as required to perform the services of the Company. Some of the third parties to which Sensitive Personal Data or Information may be disclosed/ transferred are:
 - i. Service providers appointed by the Company for the purpose of carrying out services on the Company’s behalf under contract.
 - ii. Company’s affiliates in India who may use and disclose such information for the same purposes as the Company.

- b. The Company may disclose Sensitive Personal Data or Information i) to protect and defend the rights or property of the Company; ii) to fight fraud; iii) to enforce the Company's policies; or iv) when the Company, in its sole discretion, deems it necessary in order to protect its rights or the rights of others. The Company may disclose Sensitive Personal Data or Information if otherwise required by an order by any court of Law or judicial/ quasi-judicial body/authority or for Audit purpose under any law for the time being in force including in response to enquiries by Government agencies for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences.
- c. The Company may also disclose or transfer the Sensitive Personal Data or Information, to another third party as a part of reorganization or a sale of the assets or business of the Company. Any third party to which the Company transfers or sells its assets will have the right to continue to use such Sensitive Personal Data or Information.
- d. Company uses its best efforts to ensure that such third parties store or transfer the same in a confidential manner and treat the same only according to applicable laws.

5. Information provider's rights in relation to their Sensitive Personal Data or Information collected by the Company

- a. All Sensitive Personal Data or Information provided to the Company by an information provider is voluntarily provided by such information provider.
- b. The information provider may write to the Grievance Officer, whose details are provided in Clause 7 below, to access, review, modify or correct his/her Sensitive Personal Data or Information. However, the Company is not responsible for the authenticity of the Sensitive Personal Data or Information provided by the information provider.
- c. The information provider shall, at any time while availing the services or otherwise; also have an option to withdraw his/ her consent given in relation to his/ her Sensitive Personal Data or Information. However, please note that withdrawal of consent will not be retrospective in nature and shall be applicable prospectively. Such withdrawal of the consent shall be sent in writing to the Company at p.agarwal@vpiplmail.co.in. In case the information provider does not provide his/ her information or consent for usage of Sensitive Personal Data or Information or subsequently withdraws his/ her consent for usage of the Sensitive Personal Data or Information so collected, the Company reserves the right to discontinue the services for which the said information was sought.

6. Security Practices and Procedures

The Company has implemented reasonable security practices and procedures (including appropriate managerial, technical, operational and physical security control measures) to ensure that the Personal Information and Sensitive Personal Data or Information is collected and preserved in a secure manner. The database is stored on servers secured behind a firewall and the access to servers is limited and password protected.

7. Grievance Redressal

Any discrepancies and grievances with respect to processing of Personal Information and Sensitive Personal Data or Information shall be immediately informed to the designated Grievance Officer as mentioned below:

Name : Mr. Pradeep Kumar Agarwal
Designation : Sr. Vice President Commercial
Email ID : p.agarwal@vpiplmail.co.in

8. Changes to this Policy

The Company reserves the right to revise and update this Policy at its sole discretion. Any such revisions will be effective on and from the date of posting the same on the website of the Company and will apply to all information collected both prior to and following the effective date.

By entering this website, the visitor consents to the terms of this Policy. By submitting his/her Personal Information and Sensitive Personal Data or Information to the Company, the visitor will be treated as having given his/her permission for processing the same in a manner provided in this Policy.

Disclaimer:

We inform that we use the reasonable security measures in accordance with the risks involved to safeguard and protect your sensitive personal data or information.

However, no security measures to safeguard information over internet is fully secured. We do not guarantee that information about you will not be accessed, disclosed, destroyed or modified by breach of security measures/ safeguards.

Limitation of Liability:

Information on the website is provided to you without warranty of any kind either express or implied including, but not limited to warranties of accuracy, fitness for a particular purpose etc. In no event Vacmet shall be liable for any special, indirect or consequential loss or damages for use of website.

The website may also have links to other websites. Kindly read carefully the privacy statement of any website you visit. Vacmet shall not be liable for any loss, damage, claim or expenses suffered by you as a result of visiting and accessing these third-party websites.