



IT & Privacy Policy

In accordance with Rule 4 of Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 (“Rules”) under the Information Technology Act, 2000

1. Objective

The purpose of the IT & Privacy Policy (“Policy”) is to set out the duties of Bharat Agrochem LLP (“LLP”) and its personnel when they are processing personal information including sensitive personal data and information about individuals and describe the rights of the individuals whose information including sensitive personal data and information is processed by the LLP.

The purpose of the Policy is to balance the government’s need to maintain information about individuals with the rights of individuals to be protected against unwarranted invasions of their privacy stemming from federal agencies' collection, maintenance, use, and disclosure of personal information about them.

2. Scope

The Policy is applicable on:

- All the employees working within the LLP.
- Any person who in its due course provides any information to the LLP such as visitors, contract workers, suppliers, contractors, website users, partners, designated partners etc.

The Policy lays down the manner in which the LLP collects, uses, holds, transfers and processes the sensitive information provided.

Effective Date

This Policy will be effective from 01-June-2020.



3. Definition

“Personal Information” means any information that relates to a natural person, which, either directly or indirectly, in combination with other information is available with the LLP.

“Sensitive Personal Data or Information” of a person means such personal information which consists of information relating to:

- I. Bank Account information and other financial information such as credit card or debit card or other payment instrument details;
- II. Income tax returns;
- III. Password;
- IV. Physical, physiological and mental health condition;
- V. Sexual orientation;
- VI. Medical records and history;
- VII. Biometric information;
- VIII. Any detail relating to the above clauses as provided to the LLP for providing service; and
- IX. Any of the information received under above clauses by the LLP 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.

4. Policy Details

The LLP is committed to protect your Personal Information including Sensitive Personal Data or Information. We have created this Policy to help you understand how we handle and deal with the above referred information.

I. Types of data collected and purpose of collection

We collect your bank account information which comes under the definition of Sensitive Personal Data or Information and is classified under financial information. The bank account information is collected for the purpose of timely disbursement and remittance of your salary. We also collect and retain your income tax saving proofs which may be necessary for computation and deduction of taxes. Any other information obtained such as past employment details - salary slip, appointment letter and other Personal Information that we collect from you is held in accordance



with applicable laws and regulations in India. The information of the visitors who visit our office, is collected in the visitor register available at the reception (namely name of the visitor, company from where he is visiting, mobile number of the visitor, purpose of visit, Time In and Time Out). The suppliers' and contractors' information are given by the purchase department of the LLP and is stored in SAP in a required format only for business transactions purpose.

** Website users – We currently don't have the functionality for analyzing user data in our existing website.

II. Disclosure and transfer of Personal Information including Sensitive Personal Data or Information

We may disclose your Personal Information including Sensitive Personal Data or Information to third parties for processing of such information and for other lawful purposes including providing benefits to employees such as Medclaim and other insurance benefits etc. We may also transfer your sensitive personal data in case of bankruptcy, merger and or in the event of sale.

We may share your Personal Information including Sensitive Personal Data or Information, with government agencies mandated under law to obtain Personal Information including Sensitive Personal Data or Information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, or where disclosure is necessary for compliance of a legal obligation. Also, any Personal Information including Sensitive Personal Data or Information may be required to be disclosed to any third party by us by an order under the law for the time being in force.

Transfer of information- The LLP may transfer sensitive personal data to any other Bharat Group companies which is required for official purposes. The LLP will not transfer Sensitive Personal Data or Information to any other party which are not allowed under Indian law.

Official purpose means – collection of data and use for business specific purpose only.

The LLP shall, prior to the collection of information including Sensitive Personal Data or Information, provide an option to the provider of the information to not provide the data or information sought to be collected. The provider of information shall, at any time while availing the services or otherwise, also have an option to withdraw its consent given earlier to the LLP. Such withdrawal of the consent shall be sent in writing to the LLP.



We shall not retain that information for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force.

3. Reasonable security practices and procedures: Protection of your Personal Information including Sensitive Personal Data or Information.

We shall take reasonable steps to ensure that the Personal Information including Sensitive Personal Data or Information pertaining to you is stored in a secure environment protected from unauthorized access, modification or disclosure.

We maintain Personal Information including Sensitive Personal Data or Information pertaining to you in our business records as per current regulatory requirements.

We have in place comprehensive documented information security policy and procedure to ensure that the information provided by you is reasonably secure.

We shall retain the Personal Information of the employee including Sensitive Personal Data or Information till the subsistence of his employment with the LLP or otherwise required under law or for longer period for the record of the LLP.

We shall not retain that information for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force.

We may transfer Sensitive Personal Data or Information including any information, to any other body corporate or a person in India, or located in any other country, that ensures the same level of data protection that is adhered to by us as provided for under the said Rules. The transfer may be allowed only if it is necessary for the performance of the lawful contract between the LLP or any person on its behalf and provider of information or where such person has consented to data transfer.

In case of any privacy related concerns, feedback or grievance, you can contact: Mr. Ajay Goyal (Email ID : ajay@bharatgroup.co.in) , who is the Grievance Officer and can be contacted on email id and contact information.








Security of IT Facilities: -

i. Access to the IT facilities

Access to IT facilities is controlled by password and is governed by IT password policy of the LLP. Information has been classified as confidential/public and accordingly the access has been granted.

ii. Security of computers, servers and network

The LLP has taken necessary safeguards for physical safety of all its IT components. The access to computers, servers is restricted through passwords. The LLP has taken all the necessary safeguards like firewalls, proxy servers, remote access through VPN to control and safeguard the network from outside & necessary policies are in place.



4. Review and updating of Personal Information including Sensitive Personal Data or Information

We strive to keep our records updated with your latest information. To this end, if you see any discrepancy in your Personal Information including Sensitive Personal Data or Information or if a part of your Personal Information including Sensitive Personal Data or Information changes, we request you to get in touch with Mr. Praveen Kumar (Email ID praveen.kumar@bharatgroup.co.in) , Human Resource Department or write to him at his email id.

5. Changes to our Policy

We reserve the right to update this Policy as necessary from time to time. Updated copy or the same shall be available with HR department for reference of employees and other individuals.


Prepared by
(Manager IT)

 
Checked by
(HR & IT)


Approved by
(Partner)