

PRIVACY POLICY

Last Updated: 08/07/2022

1. Purpose

This privacy policy (“**Policy**”) sets forth the policy adopted by J. L. Morison (India) Limited (“**Company**”) to collect, receive, possess, store, deal or handle Personal Information (*defined below*) including Sensitive Personal Data or Information (*defined below*), provided by an Information Provider (*defined below*) and the reasonable security practices and procedures adopted by the Company. The Company may change the Policy at any time, and such change will be effective from the date of last update of the Policy which will be set forth hereinbelow.

This Policy was last updated on 8th July, 2022 and is effective from as of that date.

2. Applicability

2.1 This Policy shall apply to:

2.1.1 All the employees, independent consultants, interns, and contract labourers working with / engaged by the Company, and

2.1.2 Any person (such as visitors, suppliers / vendors, contractors, service providers, agents, associates, business partners, customers etc.) who provides Information to the Company.

(referred to as an “**Information Provider**”)

3. Collection of Information

3.1 **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 a body corporate, is capable of identifying such person.

3.2 **Sensitive Personal Data or Information** means such personal data or information which consists of information relating to (i) password, (ii) financial information such as Bank account or credit card or debit card or other payment instrument details, (iii) physical, physiological and mental health condition, (iv) sexual orientation, (v) medical records and history, (vi) biometric information, (vii) any detail relating to the above clauses as provided to the Company for providing any service, and (viii) any of the information received under above clauses by the Company for processing, stored or processed under lawful contract or otherwise.

(Personal Information and Sensitive Personal Data or Information collectively, referred to as “**Information**”)

3.3 The Company may collect, process, store and deal with the Information provided by an Information Provider, as may be required by it, during the course of its business, including:

3.3.1 details such as name, gender, date of birth, email address, residential or communication address, contact number, blood group, photograph, educational qualification, employment related information, government issued identification or any other such information which may be customarily collected by the Company while dealing with or while engaging the services of the Information Provider,

3.3.2 biometric information for the purpose of recording in/out time and other administrative matters such as implementing biometric access controls etc.,

3.3.3 bank account or other financial information,

3.3.4 an employee’s income tax saving proofs which may be necessary for the purpose of computation and deduction of taxes,

3.3.5 any other Information obtained such as past employment details, salary slips, appointment letter etc., which is held by the Company in accordance with applicable laws and regulations in India,

3.3.6 password of official email or other official accounts of the Information Providers, and

3.3.7 details regarding medical records and history, sexual orientation and any other information collected / received from the Information Providers under lawful contract for the purpose of providing / availing services to / of the Company or for purchasing the products of the Company.

3.4 The Company will ordinarily collect Information that it believes is necessary for a lawful purpose connected with a function or activity necessary to carry out primary business functions and / or activities, comply with applicable regulations or in the capacity of an employer or a counterparty to agreements with individuals. The Company shall use the Information solely for the purpose for which it is collected.

3.5 The Company shall obtain the consent of the Information Provider in writing either through email or letter or otherwise 'regarding the purpose of usage of the Information, before collecting any Sensitive Personal Data and Information from an Information Provider.

3.6 The Information Provider shall have the option to not provide the Information sought to be collected and to withdraw its consent given earlier by conveying such withdrawal in writing to the Company. In the event the Information Provider opts to not provide the Information sought by the Company or withdraws his/her consent, the Company will have the right to terminate its agreement with the Information Provider or discontinue the provision of any service / product that is linked with such information of the Information Provider. It is hereby clarified that the withdrawal of consent by the Information Provider will not be retroactive.

4. **Collection of Information by Third Parties**

At times, Information may be collected by a third party on behalf of the Company under a lawful contract. These third parties have their own privacy policies and the Company recommends that the Information Provider should review the same. The Company is not responsible for any use of the Information provided to third-parties. The Company will be able to share the names and addresses of such third parties that may collect and/or retain Information, upon receiving a valid and written request in this regard from the Information Provider.

5. **Disclosure and Transfer**

5.1 Any Sensitive Personal Data or Information of an Information Provider collected by the Company by way of a lawful contract or otherwise, shall be treated as private and confidential and shall not be transferred or disclosed to any third party, except where it is expressly agreed in a lawful contract between the Company and the Information Provider, or where it is necessary to comply with the applicable legal and regulatory processes. Such transfer may be undertaken to another Indian or overseas body corporate that ensures the same level of data protection that is adhered to by the Company.

5.2 The Company shall have the right to share Information without the Information Provider's consent, with government agencies as mandated under law for the purpose of verification of identity or for prevention, detection, investigation including cyber incidents, prosecution and punishment of offences or otherwise with any third party, if required by an order under a law for the time being in force.

5.3 The Information Provider authorizes the Company to disclose necessary Information to its affiliates, agents or third-party service providers who provide services to the Company in connection with the services / products of the Company or the Information Provider's employment with the Company. Subject to applicable law, the types of third parties the Information Provider's Information could be disclosed to, includes:

5.3.1 Agents, contractors, service providers and external advisers engaged by the Company from time to time to carry out, provide services or advise on the functions and activities where Personal Information or Sensitive Personal Information of the Information Provider is required,

5.3.2 other related bodies corporate /affiliates of the Company,

5.3.3 regulatory bodies, government agencies, law enforcement bodies and courts, and

5.3.4 any person who the Company deems necessary for carrying out the instructions provided by the Information Provider to the Company.

5.4 The Company may also transfer Information collected from Information Providers, in case of bankruptcy, merger, change of control of the Company.

5.5 The Company will share the names and addresses of entities that may collect and/or retain the Information, upon receiving an appropriate written request in this regard.

6. Update Information

The Information Provider is responsible to update the Information provided to the Company as and when there are any changes. The Information Provider shall also be entitled to review the Information and inform the Company if any Information is found to be inaccurate or deficient and which is to be corrected or amended as feasible. All or any Information so provided by an Information Provider shall be on an 'as on' basis and the Company shall not be responsible for the authenticity of the Information supplied by an Information Provider.

7. Retention of Information

The Company shall not retain Sensitive Personal Data or Information longer than the purpose for which it is sought or is otherwise required under any other law for the time being in force. The Information so collected shall be used only for the purpose for which it is collected.

8. Reasonable Security Practices and Procedures

The Company has taken necessary safeguard for physical safety of all its information technology components. The access to computers, servers is restricted through passwords. The Company has taken all necessary safeguards like firewalls, proxy servers, remote access through virtual private network to control and safeguard its network.

9. Grievances

In case of any grievances as regards misuse or processing of Information in a time bound manner, please contact the grievance officer of the Company, Mr. Suhas Shetty, email at customer-care@jlmorison.com, contact number: (022) 61410300. The grievance officer shall redress the grievances expeditiously and no later than the period as prescribed under Rule 5(9) The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.