



DATA PROTECTION POLICY

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Table of contents:

SI No	Particulars	Page No
1	Terms and Terminologies	4
2	Reasonable Security Practices and Procedure	4
3	Purpose and Scope	4
4	Compliance with Privacy and Data Protection requirements	5
5	Data Transfer to Third Party	6
6	Rights of Individuals and Access to Information	6
7	Retention and Deletion of Personal Data or Information	6
8	Breach of Data Protection Policy	7
9	Grievance Officer	7

1. Terms and Terminologies

- 1.1. Biometrics means the technologies that measure and analyze human body characteristics, such as 'fingerprints', 'eye retinas and irises', 'voice patterns', 'facial patterns', 'hand measurements' and 'DNA' for authentication purposes.
- 1.2. Grievance Officer means OnMobile's designated 'Grievance Officer'.
- 1.3. OnMobile Global Limited ("OnMobile") and its permitted affiliates, successors, group companies, branches, subsidiaries, and assigns.
- 1.4. Personal Data or Information shall mean, any information that relates to a natural person, which, either directly or indirectly, single or in combination with other information available or likely to be available with a body corporate and is capable of distinguishing or tracing an individual's identity, such as name, race, color, religion, age, marital status, social security number, Mobile Station International Subscriber Directory Number (MSISDN), date and place of birth, biometric records and any other information that is linked or linkable to an individual, such as medical, educational, financial and employment information.

2. Reasonable Security Practices and Procedures

- 2.1. A body corporate or a person on its behalf shall be considered to have complied with reasonable security practices and procedures, if they have implemented such security practices and standards and have a comprehensive documented information security programme and information security policies that contain managerial, technical, operational, and physical security control measures that are commensurate with the information assets being protected with the nature of business. In the event of an information security breach, the body corporate or a person on its behalf shall be required to demonstrate, as and when called upon to do so by the agency mandated under the law, that they have implemented security control measures as per their documented information security programme and information security policies.
- 2.2. The international Standard IS/ISO/IEC 27001 is one such standard referred to in.

3. Purpose and Scope:

- 3.1. The purpose of Data Protection Policy ("this Policy") is to set out the process and the framework within which OnMobile can collect, use and protect Personal Data or Information of Individuals. The Policy states how OnMobile collects, uses, processes and safeguards the Personal Data or Information that it possesses, holds, and deals with respect to Individuals.
- 3.2. This Policy applies to all Individuals including but not limited to employees, consultants, managers, officers, directors, employees (whether permanent,

fixed term or temporary), contractors, volunteers, interns, home workers, part-time workers, suppliers, contractors, vendors, and agency workers of OnMobile.

4. Compliance with Privacy and Data Protection requirements:

- 4.1. **Collection, Use and Processing of Personal Data:** OnMobile would use Individual's Personal Data or Information for lawful purpose and only in connection with employment or the provision of services to OnMobile, and it will ensure that such use is fair and lawful. OnMobile while collecting Personal Data or Information of Individuals shall:
 - 4.1.1. Ensure that it will only collect and use such Personal Data or Information as is necessary for the purpose for which it is collected and not collect Personal Data more than is required.
 - 4.1.2. Ensure that Personal Data or Information is updated in the company records, as provided by Individuals.
 - 4.1.3. Ensure that it does not hold Personal Data or Information for longer than is necessary, considering its purpose, any legal or regulatory obligations to retain the Personal Data or Information or as per the requirements of OnMobile's Document Retention Policy.
- 4.2. **Security:** OnMobile shall adopt Reasonable Security Practices and Procedures, to protect Personal Data or Information from accidental loss, theft, destruction, damage, unauthorized or unlawful processing.
- 4.3. **Use of Individual's Personal Data or Information by OnMobile:** OnMobile may itself or through a third party, service provider process Personal Data or Information of Individuals and disclose such Personal Data or Information to third parties, for a variety of business purposes including, without limitation, the following:
 - 4.3.1. Performing its obligations in connection with Individual's employment with (or engagement by) OnMobile including in relation to recruitment, the provision and checking of references, personnel performance management, review and professional development, payroll, fund management and accounting (including for the payment and review of salaries and other benefits), pensions administration, and insurance administration.
 - 4.3.2. Managing and operating OnMobile's businesses, technology infrastructure, support and facilities (including in relation to the operation and monitoring of OnMobile systems and facilities) and managing OnMobile's property.
 - 4.3.3. Advertising, marketing and developing the business of OnMobile and promoting public relations in relation to the same.

- 4.3.4. Administering relationships with customers and suppliers.
- 4.3.5. Preventing and detecting breaches of law and apprehending and prosecuting offenders (including using CCTV).
- 4.3.6. Complying with law, regulation, guidance or rules, demands or requests made by local and foreign regulators, governments, and law enforcement authorities, including tax collection agencies and stock exchanges (whether or not having the force of law) or any court order or court process, or in connection with any litigation (including any discovery or disclosure process in connection with litigation).
- 4.3.7. In connection with any sale, merger, acquisition, disposal, reorganization or similar change of OnMobile's business or assets, including any due diligence or similar process carried out in connection with such a transaction; and
- 4.3.8. Any other purpose that is incidental to or connected with the foregoing purposes or otherwise in the course of OnMobile's legitimate business.

5. Data Transfer to Third Party

- 5.1. OnMobile or any other person on its behalf may transfer Personal Data or Information to any other body corporate or a person located in any other country that ensures the same level of Data Protection that is adhered to by OnMobile. The transfer may be allowed only if it is necessary for the performance of the lawful contract between OnMobile or any person on its behalf and provider of information or where such person has consented to data transfer.

6. Rights of Individuals and access to information

- 6.1. OnMobile will maintain accurate and up to date Personal Data or Information as provided by Individuals however, it shall not be responsible for authenticity of Personal Data or Information provided by such Individuals to OnMobile or any other person acting on behalf of OnMobile.
- 6.2. Individuals will have a right to request a copy of their Personal Data or Information held by OnMobile and must regularly review and update their Personal Data or Information that OnMobile holds to ensure that the Personal Data or Information is correct and accurate. Individuals may request OnMobile to cease use of their Personal Data or Information, and in such situation, such Individuals may contact the Grievance Officer.

7. Retention and Deletion of Personal Data or Information

- 7.1. OnMobile will retain certain Personal Data or Information of the Individuals when they cease to be employed/engaged by OnMobile. This Personal Data or

Information may be required for OnMobile's legal and business purposes, including any residual activities relating to employment/engagement, including for example, provision of references, processing of applications for re-employment/re-engagement, matters relating to retirement benefits (if applicable), and allowing OnMobile to fulfil any of its contractual or statutory obligations.

- 7.2. All Personal Data or Information may be retained for periods as prescribed under law or as per OnMobile policy from the date the Individuals cease to be employed/engaged by OnMobile.
- 7.3. The Personal Data or Information may be retained for a longer period if there is subsisting reason that obliges OnMobile to do so or Personal Data or Information is necessary for OnMobile to fulfil the contractual or legal obligations.
- 7.4. Once OnMobile no longer requires the Personal Data or Information, it is destroyed appropriately and securely anonymized in accordance with the law.

8. Breach of Data Protection Policy

- 8.1. In case of breach or violation of Personal Data or Information leading to the accidental or unlawful/illegitimate destruction, loss, alteration, unauthorized disclosure of or access to Personal Data or Information shared, stored or otherwise processed, Data Protection Officer needs to be immediately or promptly informed or notified.
- 8.2. In case any employee of OnMobile is found violating any section of the Data Protection Policy, appropriate disciplinary and/or legal action will be taken by OnMobile.

9. Grievance Officer

- 9.1. The details of the Grievance Officer are as follows:

Name: Manu Sharma
Designation: Director – Information Technology – CITS, India
Email: privacy@onmobile.com
Telephone: 080-4180-2506

- 9.2. The Grievance Officer shall ensure implementation of this Policy and shall make the Policy available to Individuals and redress the grievances of the provider of Personal Data expeditiously within one month from the date of receipt of grievance(s).
- 9.3. The Grievance Officer in consultation with OnMobile management will update the Policy as required from time to time.