



**OnMobile Bangladesh Technologies Private Limited
(OBTPL)**

PRIVACY POLICY

(Bangladesh Personal Data Protection Ordinance, 2025)

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Name	Designation & Department	Date
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1. PREAMBLE AND PURPOSE

1.1 This Privacy Policy (“Policy”) is adopted by **OnMobile Bangladesh Technologies Private Limited**, a private limited company incorporated under the laws of Bangladesh (“Company”), in compliance with the **Personal Data Protection Ordinance, 2025 (PDPO 2025)**.

1.2 The purpose of this Policy is to:

- Ensure lawful, fair, and transparent processing of personal data
- Protect the privacy rights of individuals
- Establish internal controls, safeguards, and accountability mechanisms
- Define responsibilities relating to data processing, storage, transfer, and protection

2. SCOPE OF APPLICATION

2.1 This Policy applies to:

- All personal data processed by the Company within Bangladesh
- Processing activities conducted by:
 - Employees
 - Directors
 - Contractors
 - Third-party processors

2.2 This Policy also applies to:

- Processing carried out outside Bangladesh where such processing relates to individuals located in Bangladesh

2.3 This Policy covers all data in:

- Digital format
- Physical records
- Structured and unstructured datasets

3. LEGAL BASIS AND COMPLIANCE COMMITMENT

3.1 The Company acknowledges its status as a **Data Fiduciary** under PDPO 2025 and undertakes to comply with all applicable obligations.

3.2 The Company shall ensure that all processing of personal data is:

- Lawful
- Necessary
- Proportionate
- In accordance with PDPO principles and requirements

4. DEFINITIONS

For the purposes of this Policy:



- **“Personal Data”** means any information relating to an identifiable individual.
- **“Sensitive Personal Data”** includes, but is not limited to:
 - Health data
 - Biometric and genetic information
 - Financial data
 - Religious, political, or sexual orientation information
- **“Restricted Data”** means data relating to national security, public order, or critical infrastructure.
- **“Data Fiduciary”** means the Company determining the purpose and means of processing.
- **“Data Processor”** means any person processing data on behalf of the Company.
- **“Data Subject”** means the individual to whom personal data relates.

5. PRINCIPLES GOVERNING PROCESSING

5.1 The Company shall adhere to the following principles:

(a) Lawfulness, Fairness, and Transparency

Data shall be processed only in accordance with law and in a transparent manner.

(b) Purpose Limitation

Data shall be collected for specific, explicit, and legitimate purposes and shall not be further processed in a manner incompatible with such purposes.

(c) Data Minimization

Only data necessary for the intended purpose shall be collected.

(d) Accuracy

The Company shall take reasonable steps to ensure that data is accurate and up to date.

(e) Storage Limitation

Data shall not be retained beyond the period necessary for the purpose for which it is collected.

(f) Integrity and Confidentiality

Data shall be processed in a manner that ensures appropriate security.

6. COLLECTION OF PERSONAL DATA

6.1 The Company may collect personal data through:

- Direct interactions
- Employment processes
- Contracts and transactions
- Digital platforms and systems



6.2 The Company shall provide clear and adequate notice at the time of data collection, specifying:

- Purpose of processing
- Categories of data
- Rights available to the data subject

7. LAWFUL BASIS OF PROCESSING

7.1 Personal data shall be processed based on:

(a) Consent

- Explicit, informed, specific, and freely given
- Capable of being withdrawn at any time

(b) Non-consent grounds (where applicable):

- Performance of contractual obligations
- Compliance with legal obligations
- Protection of vital interests
- Employment and social security obligations
- Publicly available information

8. CONSENT MANAGEMENT

8.1 The Company shall:

- Maintain verifiable records of consent
- Provide mechanisms for withdrawal
- Ensure consent is purpose-specific

8.2 Withdrawal of consent shall not affect:

- Lawful processing carried out prior to withdrawal

9. DATA SUBJECT RIGHTS

9.1 Data subjects shall have the right to:

- Access personal data
- Rectify inaccuracies
- Request erasure or restriction of processing
- Withdraw consent
- Obtain portability, where applicable

9.2 The Company shall:

- Establish a defined process for handling requests
- Respond within a reasonable timeframe
- Maintain records of such requests

10. PROCESSING OF SENSITIVE PERSONAL DATA

10.1 Sensitive personal data shall be processed only where:

- Explicit consent has been obtained; or
- Processing is permitted under law



10.2 The Company shall implement:

- Enhanced security safeguards
- Restricted access controls
- Strict purpose limitation

11. CHILDREN'S DATA

11.1 A child shall mean an individual below **18 years of age**.

11.2 The Company shall:

- Obtain verifiable parental or guardian consent
- Implement additional safeguards for children's data
- Avoid processing unnecessary child data

12. DATA SECURITY AND PROTECTION MEASURES

12.1 The Company shall implement appropriate technical and organizational measures, including:

- Encryption
- Access control mechanisms
- Authentication protocols
- Data anonymization / pseudonymisation
- Secure storage systems
- Periodic vulnerability assessments

12.2 The Company shall ensure:

- Confidentiality, integrity, and availability of data

13. DATA BREACH MANAGEMENT

13.1 The Company shall maintain a **Data Breach Response Framework**, including:

- Identification and containment procedures
- Risk assessment
- Internal escalation protocols

13.2 Where required:

- The Company shall notify the competent authority (NDGA)
- Appropriate remedial action shall be taken

14. DATA RETENTION AND DESTRUCTION

14.1 Personal data shall:

- Be retained only for necessary periods
- Be reviewed periodically

14.2 The Company shall implement:

- Data retention schedules
- Secure deletion mechanisms
- Archival controls where required by law

15. CROSS-BORDER DATA TRANSFER

15.1 Personal data shall not be transferred outside Bangladesh unless:

- Permitted under PDPO 2025
- Required safeguards are implemented
- Regulatory approvals (if applicable) are obtained

15.2 The Company shall:

- Maintain records of cross-border transfers
- Ensure contractual protections with recipients

16. DATA LOCALIZATION

16.1 The Company shall comply with all requirements relating to:

- Storage of restricted or confidential personal data within Bangladesh

16.2 Cross-border transfer of such data shall be:

- Subject to regulatory approval
- Restricted where mandated

17. ENGAGEMENT OF DATA PROCESSORS

17.1 The Company shall ensure that:

- Data processors are bound by written agreements
- Processors comply with applicable legal requirements

17.2 Such agreements shall include:

- Confidentiality obligations
- Security requirements
- Audit rights
- Liability provisions

18. ACCOUNTABILITY AND RECORD-KEEPING

18.1 The Company shall maintain:

- Records of processing activities
- Consent logs
- Data breach records



- Data transfer records

18.2 The Company shall demonstrate compliance at all times.

19. DATA PROTECTION GOVERNANCE

19.1 The Company shall appoint:

- A **Data Protection Officer / Chief Data Officer**, where required

19.2 Responsibilities shall include:

- Monitoring compliance
- Advising management
- Acting as point of contact with authorities

20. AUDITS AND COMPLIANCE REVIEWS

20.1 The Company shall conduct:

- Periodic internal audits
- Risk assessments

20.2 Independent audits shall be undertaken where required by law.

21. DISCLOSURE OF PERSONAL DATA

21.1 Personal data may be disclosed:

- To regulators
- To law enforcement authorities
- For legal proceedings

21.2 Such disclosures shall be:

- Limited to necessary scope
- Documented and justified

22. EXEMPTIONS

22.1 Processing without consent may be carried out where permitted under law, including:

- National security
- Crime prevention
- Legal compliance
- Research and statistical purposes

23. REGULATORY AUTHORITY

23.1 The Company shall comply with directions issued by the:

- **National Data Governance Authority (NDGA)**

23.2 The Company shall cooperate fully with regulatory inspections and inquiries.

24. POLICY REVIEW AND AMENDMENT

24.1 This Policy shall be:



- Reviewed periodically
- Updated as required

24.2 Amendments shall be:

- Approved by management
- Communicated to stakeholders

25. CONTACT AND GRIEVANCE REDRESSAL

For any data protection-related concerns:

Email id : Privacy@onmobile.com