



Privacy Policy

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RELEASE AUTHORIZATION

Name	Title	Signature
Dipika Pawar	Manager - Information Security	Dipika Pawar

REVIEWER AUTHORIZATION

Name	Title	Signature	Date
Dipika Pawar	Manager - Information Security	Dipika Pawar	15-June-2022

APPROVAL AUTHORIZATION

Name	Title	Signature	Date
Puja Srivastava	Chief Technology Officer	Puja	15-June-2022

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1. Office of Responsibility

The Chief Technology Officer and Information Security Team.

2. Purpose

As stated in the Company Information Security Program Charter, the Company will follow a risk management approach to developing and implementing Information Security policies, standards, guidelines, and procedures. The Information Security Program is designed to protect information assets by developing Information Security policies to identify, classify, and define the acceptable use of company information assets.

The Privacy Policy defines Company objectives for securing and protecting personally identifiable information and other information.

The types of personal data include names, addresses, phone numbers, birthdates, social security numbers, tax identification numbers, national insurance numbers and financial account numbers.

3. Scope

The Policy applies to all employees, contractors, consultants and vendors who access, use or control company resources.

4. Policy

4.1 Objectives

- The Company adheres to legal, regulatory and customer privacy requirements.
- The Company collects personally identifiable information when voluntarily submitted by our online and onsite visitors. The information provided is used to fulfil specific requests unless given permission to use it in another manner.
- In connection with the services we provide, the Company may collect the following types of information:
 - Personally Identifiable Information. Names, addresses, email addresses, phone numbers, birthdates, Aadhaar, tax identification, financial account, national insurance numbers, and company information.
 - Cookies. When a visitor views Company websites, a cookie is sent out to the viewer's computer that will identify the visitor's browser. These cookies enable the website to recognize the visitor's computer the next time the visitor views the Company website. These cookies will be used exclusively to collect information concerning the use of the website. Cookies contain no personally identifiable data, so the visitor's personally identifiable information is not collected or retained.
 - User Communications. When a visitor sends an email or other communication to the Company, these communications may be retained in order to process inquiries, respond to requests, and improve overall services.



- Affiliated Websites. Personal information that a visitor may provide to websites affiliated with the Company may be sent to the Company in order to deliver services to the Company or other entities affiliated which the Company provides. The Company processes such information in accordance with the Policy.
- The Company reserves the right to collect and process personal information in the course of providing services to our clients without the knowledge of individuals involved. Where the Company collects personal information from individuals within the Indian region, upon request, the Company will inform them about the types of person information collected from them, the purposes for which it was collected, and uses of the information, and the types of non-agent third parties to which the Company discloses that information.
- As a general rule, the Company will not disclose personally identifiable information except when the Company is required or permitted per customer agreement, law (including pursuant to national security of law enforcement requirements) or otherwise, such as when the Company believes in good faith that the law requires disclosure or other circumstances outlined in this Privacy Policy require or permit disclosure.
 - The Company may share information with governmental agencies or other companies assisting in fraud prevention or investigation. The Company may do so when:
 - Permitted or required by law
 - Trying to protect against or prevent actual or potential fraud or unauthorized transactions
 - Investigating fraud which has already taken place
 - This information, however, is not provided to these companies for marketing purposes.
 - Permitted transfers of information, either to third parties or within the Company, include the transfer of information within the India region and shall not be moved out of one jurisdiction to another.
- The Company takes reasonable steps to protect personally identifiable information. To prevent unauthorized access or disclosure of personally identifiable information, maintain data accuracy, and support the appropriate use and confidentiality of personally identifiable information, either for its own purposes or on behalf of our clients, the Company has put in place appropriate physical, technical, and managerial procedures to safeguard and secure the personally identifiable information and data the Company possesses.
- The Company collects and maintains personally identifiable information in a manner that is compatible with the purpose for which it was collected and maintained, or as subsequently authorized by an individual or client. To the extent necessary for such purposes, the Company takes reasonable steps to confirm that personal information is accurate and complete with regard to its intended use.
- Whenever the Company is processing personal data, it will take reasonable steps to keep personal data accurate and up-to-date for the purposes for which they were collected. It will provide data subjects with the ability to exercise the following rights under the conditions and within the limits set forth in the law. If you wish to contact us regarding the use of your personal data or want to object in whole or in part to the processing of your personal data, please contact us. If you have provided

consent, you may withdraw consent. You may also request, subject to confidentiality obligations, to:

- Access your personal data as processed by the Company
 - Ask for correction or erasure of your personal data
 - Request portability, where applicable, of your personal data, i.e., that the personal data you have provided to the Company, are returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format.
- The Company complies with the Privacy regulations set forth by the India's IT ACT 2000 regarding the collection, use, and retention of personal information. The Company has certified to the regulators that it adheres to the statutory requirements. If there is any conflict between the terms in this Privacy Policy and the Privacy Principles, the Privacy Principles shall govern.
 - The Company utilizes a self-assessment approach to support compliance with this Privacy Policy.
 - The Company periodically verifies that related policies are accurate, comprehensive for the information intended to be covered, prominently displayed, implemented, and are in conformity with the principles of this Privacy Policy.
 - The Company encourages interested persons to raise any concerns with the Company. The Company will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Privacy Policy.
 - If the Company, the Data Protection Authorities, or other qualified government agencies determines that the Company has not complied with this Privacy Policy, the Company shall take appropriate steps to address any adverse effects related to non-compliance and to promote future compliance.
 - If the Company determines an employee is in violation of this Privacy Policy, that employee will be subject to the Company's disciplinary process.
 - In the event that the Company merges, is acquired by or sells its assets to a third-party, the Company may disclose personally identifiable information as is reasonably necessary in connection with any such merger, acquisition or sale. Any such party with whom the Company merges or who acquires some of all of the assets of the Company may not have the same or similar privacy guidelines as set forth in this Privacy Policy and may use personally identifiable information in a manner other than as set forth herein.
 - This Privacy Policy shall be reviewed annually and updated as necessary to comply with applicable regulations.
 - The Company will post any revised Privacy Policy on its website, or a similar website that replaces that website.
 - Information obtained from or relating to clients or former clients is further subject to the terms of any privacy notice provided to the client, any contract or other agreement with the client, and application enforcement laws.



- The Company will cooperate with the appropriate regulatory authorities, including local data protection regulatory authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between the Company and an individual.

5. Policy Compliance

5.1 Responsibilities

- The Chief Technology Officer (CTO) is the approval authority for the Privacy Policy.
- The Chief Technology Officer and Information Security Team are responsible for the development, implementation, and maintenance of the Privacy Policy.
- Company management is accountable for ensuring that the Privacy Policy and associated standards and guidelines are properly communicated and understood within their respective organizational units. Company management is also responsible for defining, approving, and implementing procedures in its organizational units and ensuring their consistency with the Privacy Policy and associated standards and guidelines.
- All individuals, groups, or organizations identified in the scope of the policy are responsible for familiarizing themselves with the Privacy Policy and complying with its associated policies.

6. Policy Enforcement and Compliance

Compliance with the policy is mandatory and Spocto department managers shall ensure continuous compliance monitoring within their department. Compliance with the statements of the policy is a matter of periodic review.

Any breach of the policy may constitute a security violation and gives Spocto the right to conduct disciplinary and / or legal action, up to and including termination of employment or business relationship.

7. Document Management

Technological advances and changes in the business requirements will necessitate periodic revisions to documents. Therefore, this document may be updated to reflect changes or define new or improved requirements as and when required and in compliance with the Information Security Program Charter.

Any change will require the approval of the Information Security Steering Committee (ISSC).

8. Glossary

Term	Definition
Information Security	The preservation of confidentiality, integrity and availability of information; in addition, other properties, such as authenticity, accountability, non-repudiation, and reliability can also be involved.
Policy	A plan of action to guide decisions and actions. The term may apply to government, private sector organizations and groups, and individuals. The policy process includes the identification of different alternatives, such as programs or spending priorities, and choosing among them on the basis of the impact they will have.



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