



#### PRIVACY POLICY

This Privacy Policy forms a binding contract between you and Vedam Design and Technical Consultancy Private Limited and its group companies including Vedam Technical Services FZE, Vedam Design Solutions Pte Ltd., and/or any other subsidiaries/ affiliates company ("Vedam").

## AN IMPORTANT NOTICE FOR INDIVIDUALS WITHIN THE EUROPEAN UNION

The General Data Protection Regulation (GDPR) is a regulation in European Union law on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA). We are not involved in either collecting data from EU residents or in processing such data. As such, we are not required to conform to the stipulations of the GDPR. Therefore, while we endeavour to implement world-class privacy norms, we do not actively seek compliance with the GDPR. If you are an EU citizen, please be advised that by using this Website or transacting with us, you waive all and any entitlement that may otherwise be available to you under the GDPR. We disclaim any liability to ascertain the applicability of GDPR to you and/or to seek your consent of such waiver separately.

#### AN IMPORTANT NOTICE FOR CALIFORNIA RESIDENTS

The California Consumer Privacy Act (CCPA) is a regulation that is intended to enhance privacy rights and consumer protection for residents of California, United States. The CCPA applies to a business that collects consumers' personal data, which does business in California, and satisfies certain financial thresholds. We are not involved in either collecting data from California residents or in doing business in California. As such, we are not required to conform to the stipulations of the CCPA. Therefore, while we endeavour to implement world-class privacy norms, we do not actively seek compliance with the CCPA. If you are a California resident, please be advised that by using this Website or transacting with us, you waive all and any entitlement that may otherwise be available to you under the CCPA. We disclaim any liability to ascertain the applicability of CCPA to you and/or to seek your consent of such waiver separately.

# TERMS USED IN THIS PRIVACY POLICY

In this Privacy Policy:

- "Personal Data" means any information relating to an identified or identifiable natural person.
- "Privacy Policy" means this privacy policy.
- "Services" means a service that we provide for a fee or gratis. You are using our Service when you sign up or sign in to get access to any Service provided by us.
- "we", "us", "our", and "Vedam" refer to Vedam Design and Technical Consultancy Private Limited.
- "Website" refers to https://www.vedamdesign.com/.
- "you" refers to you, as a visitor to the Website, as a user or subscriber of the Services, as an employee of Vedam, or as a person whose information is made available to us.

# **ABOUT THIS PRIVACY POLICY**

We understand the importance of data and its privacy. This Privacy Policy explains the type of information we collect or we receive, how we handle your information and comply with the requirements of applicable privacy laws.

This Privacy Policy is applicable to any person who visits the Website, or inquiries about our Services, or avails our Services, or is in or applies for employment with us or whose information is otherwise made available to us in the context of the Services or otherwise. You may note that information and privacy practices of our business partners, software providers, may be materially different from this Privacy Policy. We recommend that you review the privacy statements and policies of any such third parties with whom you interact. We do not make any representations concerning the privacy practices or policies of such third parties or terms of use of such websites, nor do we guarantee the accuracy, integrity, or quality of the information and content available on such websites. Their inclusion or exclusion on the Website does not imply our endorsement.





## WHAT DATA DO WE COLLECT OR PROCESS ABOUT YOU, AND FOR WHAT PURPOSE?

We collect information, including personal data, about you to be able to make the Website or Services useful to you or for engaging with you or providing employment with us. This information may be collected by us from the data which you give to us. We may also derive your information from other sources. Such information may, inter alia, include the following:

- Your personal identifiable information including your demographic details (such as your name, age, and gender), contact details (such as your email address, postal addresses, telephone number), identify proofs such as PAN, Aadhaar Card details and your insurance related data.
- Your financial information including banking details (such as your bank account no., bank, branch, IFSC).
- Your technical Information collected by our technology (such as your browser type, operating system, server details, Internet Protocol (IP) address).
- Information voluntarily provided by you while engaging with us.
- Information generated while you enquire about us.
- Information available in the public domain, including over social media platforms.
- Information pertaining to any other person in respect of whom you make disclosures to us. In such case, you must
  confirm and represent that each of the other person for whom an enquiry/ transaction has been made, has agreed to
  have the information shared by you, disclosed to us.

We may process the data that we have about you, in the following manner.

- We may process data about your use of our Website or our Services ("usage data"). The usage data may include personal identifiable information, financial information, information voluntarily provided by you, technical information or information available in public domain. This usage data may be processed for the purposes of analysing your use of the Website and Services or our engagement with us in order to improve our performance, to maintain security and to communicate with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely monitoring and improving our Website or Services.
- We may process information that you post for publication through our Services or while engaging with us under employment or otherwise ("publication data"). The publication data may be processed for the purposes of enabling such publication. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our business. In some cases, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- We may process information contained in any enquiry you submit to us regarding our Services or while applying to
  work with us ("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing and selling
  goods and/or services to you and for communicating with you. The legal basis for this processing is your consent.
- We may process information that you provide to us during the course of your employment with us or while applying for employment with us ("employment data"). The employment data may include your personally identifiable information, financial information, information voluntarily provided by you, technical information, information available in public domain and any other information that we may ask from you. The source of the employment data is you. The employment data may be processed for the purposes of legitimate interests including your background verification, your payroll management and other facilities provided to you. The legal basis for this processing is your consent.

In addition to the specific purposes for which we may process your personal data, we may process any of your personal data identified in this Privacy Policy where necessary for:

- the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-ofcourt procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights, and the legal rights of others.
- the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.





We may use your data for the following purposes.

- To identify and engage with you as the candidate, employee, vendor, or client of Vedam;
- To enable you to use the Website and our Services;
- To publish fact-based views and opinions regarding our Services and your engagement with us;
- To improve the quality of our interaction with you;
- To send you notifications, verification message(s) or email(s);
- To contact you, if necessary or respond to your queries;
- To send newsletters, surveys, offers, and other promotional materials;
- To prevent, detect and investigate any potential unlawful or prohibited activities.

### WHOM DO WE SHARE YOUR DATA WITH?

By accepting this Privacy Policy, you hereby consent to the use of your personal data by Vedam for the purposes listed in this Privacy Policy. We may share your data with legal or statutory or regulatory agencies or authorities; our employees, officers, advisors and agents; our marketing partners, our service providers, solely for the purposes listed in this Privacy Policy.

We may share the information given by you with third parties where we feel that such third parties may improve our engagement with you. Additionally, we may also employ third-party service providers and individuals to perform obligations on our behalf. The legal basis for this sharing is your consent

In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this sharing is your consent

We only share your personal data on a partial and "need-to-know" basis with any third party. We shall take all reasonable steps to ensure that the confidentiality of your information is maintained by imposing confidentiality standards on all the third parties with whom we part this information.

By using our Website or Services or engaging with us or applying for employment or employing with us, you agree to us collecting, using and sharing of your personal data as per the terms of this Privacy Policy. You always have the right to refuse or withdraw your consent to share/dissemination of your personal data by contacting us as per the details provided in this Privacy Policy. However, in such an event, you may no longer be eligible to engage with us.

# WHERE DO WE PROCESS AND STORE YOUR DATA?

Your data will be processed and stored in India and at other locations from where we operate.

## **HOW LONG DO WE RETAIN YOUR DATA?**

Your personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We intend retain your personal data as follows:

- Usage data will be retained for a minimum period of one week following the date of your visit, and for a maximum
  period of ten years following the date of your last visit.
- Publication data will be retained for a minimum period of one week following the publication of such data, and for a
  maximum period of ten years following the date on which such data is removed from such publication.
- Enquiry data will be retained for a minimum period of one day following the date of the enquiry, and for a maximum period of ten years following the date of the enquiry.
- Employment data will be retained for the duration of the employee's tenure with Vedam and for an additional period of ten years post termination of employment, following the date of the communication.





In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

| SI. | Category of Data | Factors on which period of retention will be based           |
|-----|------------------|--|
| 1.  | Usage data       | Parameters of usage being analysed                           |
| 2.  | Publication data | Means of publication; citation of publication in other works |
| 3.  | Enquiry data     | Means of enquiry; nature of Service enquired for             |
| 4.  | Employment data  | Means of employment; requirements of law                     |

Notwithstanding the foregoing provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or where we reasonably believe that the retention of such data is required in order to protect your or any third-party interest.

### WHAT ARE YOUR RIGHTS REGARDING YOUR DATA WITH US?

This Section summarises the rights that you have in respect of your data. Please note that some of the rights available to you are subject to the requirements of the applicable law. You may peruse the relevant laws for a complete understanding your rights. Your principal rights concerning your personal data are as below:

- Right to access and review: You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data. Further, you have the right to review your personal data available with us.
   Subject to the condition that the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.
- Right to rectification and modification: You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. Further, you have the right to modify your personal data with us.
- Right to erasure: In certain circumstances you have the right to the erasure of your personal data. However, there are
  exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right
  of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or
  defence of legal claims.
- Right to restrict/ object processing: In some circumstances you have the right to restrict or object the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; or processing is unlawful but you do not desire erasure. Where processing has been restricted or objected on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise, or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You may exercise any of your rights in relation to your personal data by a written notice to us. In order for us to comply with your request, your notice must clearly state the right that you wish to exercise and identify your information in respect of which you wish to exercise such right. Please note that as a security measure, we may require you to verify your identity before accepting any request concerning your personal data.

### HOW DO WE USE COOKIES?

Cookies are small pieces of text stored by a website you visit in your browser and subsequently sent by your web browser in every request to the website. Cookies do not typically contain any information that personally identifies you, but personal information that we store about you may be linked to the information stored in and obtained from cookies. You may change the options on your web browser and block cookies. However, blocking cookies may disable certain features on the Website.

### **SECURITY OF YOUR DATA**

We will make commercially reasonably efforts to secure the data provided to us and adopt reasonable security practices to ensure that the information collected is secured as per the applicable laws in India. If credentials are used to help protect your accounts and account information, it is your responsibility to keep the such credentials confidential.





While we endeavour to take all reasonable and appropriate steps to keep secure the information collected and prevent unauthorized access, you acknowledge that the internet is not entirely secure and that we cannot and therefore do not provide any absolute assurance regarding the security of the information collected. We also cannot warrant that such your information may not be misused in the event our safeguards and protocols are breached by a malicious third-party. Further, we are not liable to, nor can we fully control the actions of other users with whom you may choose to share your information.

If any security breach comes to our knowledge, then we may take all steps required to protect misuse of such information:

- Secure areas potentially related to the breach and mobilize IT team to prevent additional data loss;
- Switch off the servers and change the access code to prevent additional data loss;
- Fix vulnerabilities;
- Identify the sensitivity of data breached and possible impact;
- Notify the appropriate regulatory/Statutory Bodies and affected parties;
- Take the steps to improve the system security on a going forward basis.

## **LINKS TO OTHER WEBSITES**

The Website may contain links to third-party sites and platforms to which this Privacy Policy or information practices do not apply.

### LIMITATION OF LIABILITY

We are not be responsible for verifying the authenticity of the information supplied by you. In case of any erroneous data, our liability is limited to removal of such data from our system. We are not liable for any data loss or theft due to an unauthorized access to your computer or device. We shall not be responsible for any breach of security or for any actions of any third parties that receives your personal data or events that are beyond our reasonable control including, acts of government, computer hacking, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of internet service or telephone service etc. Our entire liability and your exclusive remedy for all matters arising out of this Privacy Policy shall be correction of such breach on going forward basis..

## **DERIVATIVE DATA**

We may generate derived data and anonymous statistical information based on the data available with us. We may use such data or information for any legitimate purpose as we may determine, without any compensation to you.

## **CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **CONTACT DETAILS**

This Website is owned and operated by Vedam Design and Technical Consultancy Private Limited and its group entities.

- We are registered in India bearing CIN U74140MH2007PTC272141, and having our registered office address at: 2nd floor, Unit no. 3 and 4, Kalpataru Prime, Plot no. D3, Road Number 16, Wagle Industrial Estate, Thane Wagle I.E. Thane MH 400604 IN.
- You can contact us (a) by post: at our registered office address provided above; or (b) by email: on vedam@vedamindia.com;
- For any request that is not attended to your satisfaction, you may reach out to Ms. Reeta Sharma, Grievance Officer/ Data Protection Officer, on <a href="mailto:accounts@vedamindia.com">accounts@vedamindia.com</a>.

We appreciate you taking the time to read this Privacy Policy. We know that you are placing your trust in us when you choose to share your personal information with us and we intend to use it responsibly.