

SEWA Grih Rin Limited

*POLICY ON DATA PROTECTION AND
PRIVACY OF PERSONAL DATA /
INFORMATION SECURITY
Version 1.0*

Prepared by:

IT Department

Accepted by:

Board of Directors

on:

December 08, 2016

Table of Contents

PURPOSE	3
SCOPE.....	3
POLICY	3
DEFINITIONS.....	3
PROCEDURE	5
Use of Personal Data.....	5
Integrity of Personal Data	5
Notice.....	5
Access to Personal Data	5
Procedure for Accessing Personal Data	5
Security of Personal Data / Information Security	5
Transfer of Personal Data	6
Accountability	6
Procedure for Inquiries and Complaints.....	6
Enforcement	6
Amendments.....	6
Information Subject to Other Policies.....	6
Contact Information.....	7

PURPOSE

This document has been prepared considering the mandated list of policy documents as required by National Housing Bank.

While drafting this document the guidelines, regulations and circulars periodically issued by The Reserve Bank of India have been followed which require banks to maintain the confidentiality and privacy of customers. The Master Circular on Customer Service in banks issued in 2009 contains a detailed clause on Customer Confidentiality Obligations. The clause reaffirms the customary banking obligation of secrecy and extends it by forbidding the usage of customer information for “cross-selling purposes”. It imposes a restriction on data collection by requiring Banks to “ensure that information sought from the customer is relevant to the perceived risk”.

UIDAI has also issued Data Protection Guidelines. The first and foremost step towards following the guidelines is to have a Policy on Data Protection and Privacy of Personal Data.

This Policy sets forth how the Company will manage the Personal Data that it collects in the normal course of business and ensure Information Security.

SCOPE

This Policy is applicable to SEWA Grih Rin Limited (SGRL). Specifically, this Policy applies to:

- All individuals who provide Personal Data, such as Loan Applicants, Associates, Job Applicants, Contingent Workers, Interns, Retirees, Contractors, Customers, Business Partners, Shareholders, Directors and others;
- All locations where the Company operates, even where local regulations do not exist; and
- All methods of contact, including in person, written, via the Internet, direct mail, telephone, or facsimile.

This Policy is designed to inform all associates about their obligation to protect the privacy of all individuals (whether Loan Applicants, Associates, Job Applicants, Contingent Workers, Interns, Retirees, Contractors, Customers, Business Partners, Shareholders, Directors and others) and the security of their Personal Data.

POLICY

This Policy does not necessarily describe how local management may handle Personal Data in order to comply with local regulations. Local management, in conjunction with the responsible human resources manager(s), will be responsible for accessing and complying with local regulations regarding the processing of Personal Data.

DEFINITIONS

Controller	Refers to the Company and its authorized third parties, which determine the purposes and means of processing of Personal Data.
Data Subject	Refers to any associate or third person (e.g., Loan Applicants, Associates, Job

	Applicants, Employees, Contingent Workers, Interns, Retirees, Contractors, Customers, Business Partners, Shareholders, Directors and others) who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity.
General Business Purpose	Defined as the Processing of Personal Data for any activity related to the commercial operations of the Company. This could include, but is not limited to, its sales and marketing; protecting intellectual property; the provision of services; internal operations; information technology and general employment matters, including recruitment both internally and externally. Data processing for General Business Purposes includes, but is not limited to, Loan Applicant's data, publishing directories, maintaining files, payroll processing, conducting performance reviews, and inter / intra-company communications
Personal Data	Defined as any information related to an identified or an identifiable person. For example, a Data Subject's home address, e-mail address, telephone number, or government-issued identification numbers would constitute Personal Data.
Processor	Defined as a natural or legal person, or any other entity that processes Personal Data on behalf of the Controller and under its control. In this context, a Processor may be its own employees or a payroll preparation firm that works on behalf of the Company and under its control etc. The Company requires Processors to protect the privacy, confidentiality and security of Personal Data.
Processing	Defined as any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.
Sensitive Data	A subset of Personal Data, and refers to any Personal Data pertaining to racial or ethnic origins, trade union membership, medical or health conditions, political or religious beliefs, or criminal history.
Third Party	Defined as any natural or legal person, public authority, agency or any other entity other than the Data Subject, the Controller, the Processor and the persons who, under the direct authority of the Controller or the Processor, are authorized to process the Personal Data.

PROCEDURE

Use of Personal Data

In the course of day-to-day business operations, authorized individuals within the Company may from time-to-time utilize and / or transfer Personal Data among various Company locations. These transfers of Personal Data are necessary in order to carry out the Company's General Business Purposes.

Specifically, Personal Data may be used as follows:

- To identify a Data Subject personally;
- To communicate with a Data Subject;
- To manage the business.
- To comply with human resource requirements;
- To comply with government regulations;
- To provide associate benefits;

Integrity of Personal Data

The Company will take reasonable steps that Personal Data and Sensitive Data are:

- a) Obtained, where possible, directly from the Data Subject to whom the Personal Data relates;
- b) Obtained and processed fairly and lawfully by the Company for General Business Purposes;
- c) Relevant to and no more revealing than is necessary for General Business Purposes; and
- d) Kept up-to-date to maintain data accuracy on best effort basis, while data is under the control of the Company, and kept only for so long as is reasonably necessary.

Notice

The Company informs Data Subjects about the purposes for which Personal Data is collected and used. In certain situations, Personal Data may be rendered anonymous so that the names of the Data Subjects are not known by Processors. In these cases, Data Subjects do not need to be notified.

Access to Personal Data

The Company takes steps on best effort basis to make sure that the Personal Data it uses is correct. The Company will allow Data Subjects reasonable access to Personal Data about themselves during normal working hours and upon reasonable request, and will be allowed to update and / or correct any inaccurate information.

Procedure for Accessing Personal Data

Questions about Personal Data and / or authorization to access such Personal Data are to be directed to Data Subject's concerned authority. Unauthorized access may be grounds for disciplinary actions, including termination.

Security of Personal Data / Information Security

The Company will take reasonable precautions to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration and destruction. The Data in physical form will be kept at

the storage location with limited access only to the concerned authority. The Data in Digital form will be stored in restricted storage space with limited access only to the concerned authority. Backup of Data in Digital Form will be kept at a location other than main storage location to protect from data loss.

Transfer of Personal Data

Subject to this Policy, the Company may from time-to-time transfer Personal Data within and between its various locations for General Business Purposes, in compliance with this Policy.

The Company's personnel, Directors, Shareholders, outside firms and consultants who receive Personal Data may be located in the Data Subject's home country or any other country in which the Company or its affiliates operate out of. Therefore, Personal Data may be transferred to any country in the world, including but not limited to India and other countries, and where the privacy laws may be more or less protective than the privacy laws where the Data Subjects live or work.

Accountability

The Company expects its employees, associates, independent contractors, subcontractors, and partners to maintain the trust placed in the Company by those Data Subjects who provide personal information to the Company. The Company may periodically audit privacy compliance, and where necessary, will extend by contract its privacy policies and data protection practices to the Company's supplier and partner relationships.

Procedure for Inquiries and Complaints

A Data Subject may contact the Company's Compliance Officer at the contact details given below with inquiries or complaints regarding the Company's processing of Personal Data.

Enforcement

The Company uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. The Company encourages interested persons to raise any concerns using the contact information provided and will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Data in accordance with the Principles.

Amendments

This Privacy Policy may be amended from time to time consistent with the statutes of Government of India or any state or any other policy enforced by Company. Revisions will be posted on the Company's website(s).

Information Subject to Other Policies

The Company is committed to following the Principles for all Personal Information. However, certain information is subject to policies of Company that may differ in some respects from the general policies set forth in this Privacy Policy.

Contact Information

Questions or comments concerning this Policy should be directed to Company via mail or email as follows:

Chief Compliance Officer,
SEWA Grih Rin Limited.
206-207, 2nd Floor, Vikram Towers,
Rajindra Place, New Delhi – 110008.
contact@sgrlimited.in