

## Privacy Policy

This policy ("Privacy Policy") is applicable to Venbha iT and all its subsidiaries and/or branch offices in India. It provides the

practices and policies applicable to Venbha iT (including its employees, interns, contractors, consultants, clients, customers or any

other party directly or indirectly engaged for the purpose of business or otherwise) for handling of or dealing in Personal

Information, including Sensitive Personal Data or Information (as defined below) that is lawfully collected by Venbha iT, hereby

referred to as Venbha iT. We collect personal data of our employees, potential employees, clients, suppliers, business contacts,

shareholders and website users or any other individual or entities wherever required for business purposes or otherwise.

Venbha iT attaches great importance to your right to privacy and the protection of your personal data. We want you to feel secure that

when you deal with Venbha iT, your personal data are in good hands.

Venbha iT protects your personal data in accordance with applicable laws and our data privacy policies. In addition, Venbha iT

maintains the appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful

processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage

thereto.

### General Definitions

Reference to you or your in this Privacy Policy refers to any natural person (including the employees of Venbha iT) who provides to

Venbha iT any information referred in Appendix 1 of this document.

Act shall mean the Information Technology Act, 2000 and Rules thereunder as amended from time to time.

Information shall mean and include Personal Information and Sensitive Personal Data and Information as may be collected by Venbha iT.

Personal Information (PI) shall have the same meaning as under Rule 2 (i) of the Information Technology (Reasonable security practices

and procedures and sensitive personal data or information) Rules, 2011 as amended from time to time. For ease of reference Rule 2 (i)

of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 is

re-produced under Appendix 1.

Rules shall mean the Information Technology (Reasonable security practices and procedures and sensitive personal data or information)

Rules, 2011 as amended from time to time.

Registered User shall mean such user whose registration is accepted by Venbha iT.

Sensitive Personal Data and Information (SPDI) shall mean and include information under Rule 3 of the Information Technology

(Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 as amended from time to time.

For ease of reference Rule 3 of the Information Technology (Reasonable security practices and procedures and sensitive personal data

or information) Rules, 2011 is re-produced under Schedule 1.

All words and expressions used and not defined in this document but defined in the Act or the Rules shall have the meanings

respectively assigned to them in the Act or the Rules.

Venbha iT is fully committed to respecting your privacy and shall ensure that your Information is safe. This privacy policy sets out

the practices adopted in respect of Information, including the types of Information that is collected, how the Information is

collected, how the Information is used, how long the Information is retained and with whom it is shared (Privacy Policy). This Privacy

Policy is published in compliance with the provisions of the Act and the Rules made thereunder that require publishing the privacy

policy on Venbha iTs website.

Collection of Information:

You may use Venbha iTs website to access Information, learn about its products and services, read publications and check career

opportunities etc. without providing any PI/SPDI. Venbha iT may collect and process PI/ SPDI provided by you in the following forms:

Should you opt to access such services of Venbha iT, which are available only to Registered Users, information is required to be

provided by you at registration (refer Appendix 1).

Information that you provide directly to Venbha iT via email or electronic communication.

Information that you provide to Venbha iT over telephone. Venbha iT may make and keep a record of such information shared by you.

Information that you provide to Venbha iT in physical form whether sent through post or courier or handed over to a Venbha iT

representative in person.

PI/SPDI collected by Venbha iT from its employees (refer Appendix 2), suppliers, clients, prospects or onsite consultants or by lead

generation for the purpose of employment, availing/providing services etc.

You will at all times have the option of not providing Venbha iT with PI/SPDI that Venbha iT seeks to collect. Even after you have

provided Venbha iT with any PI/SPDI, you will have the option to access, modify, rectify or withdraw the consent given earlier by

contacting [info@venbhait.com](mailto:info@venbhait.com) or contact us on [www.venbhait.com](http://www.venbhait.com) In such cases, Venbha iT will have the right to not provide or

discontinue the provision of any service that is linked with such PI/SPDI.

Use of Information Collected:

Any information, if collected will be used in connection with the relevant purpose as communicated by Venbha iT to you via verbal or

written method of any sort. The provider of information availing any Services from Venbha iT shall be deemed to have consented to

Venbha iT for the use of such information as under this policy. Employees, suppliers, clients, prospects or consultants of Venbha iT

shall be duly advised about the purpose for which any Information is being collected at the time of such collection. We will not use

your personal data for purposes that are incompatible with the purposes of which you have been informed, unless it is required or

authorized by law, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

Sharing of Information:

Where PI/SPDI is required to be shared, arising out of any contractual obligation, Venbha iT shall part with such PI/SPDI only in

accordance with your consent for the same. To the extent necessary to provide you the requested Services or to the extent required

under applicable law, we may transfer personal data with individuals or following third parties in connection with a (potential)

corporate or commercial transaction. Before we do so, we shall take the necessary steps to ensure that your personal data will be

given adequate protection as required by relevant data privacy laws and Venbha iTs internal policies. Venbha iT may also transfer your

personal data to any of its global affiliates/partners in furtherance of any visits to our Venbha iT locations:

Employees or Consultants (including auditors, authorized vendors) on a 'need to know' basis under a Non-Disclosure Agreement.

Governmental authorities, in such manner as permitted or required by applicable law; and

Legal proceedings: In the event, Venbha iT is required to respond to subpoenas, court orders or other legal process, your PI/SPDI may

be disclosed pursuant to such subpoena, court order or legal process, which may be without notice to you.

Security of Information:

Venbha iT strives to ensure the security, integrity and privacy of your PI/SPDI and adequacy of protection of your Information against

unauthorized access, alteration, disclosure or destruction. Stringent security measures (physical, electronic and managerial) are in

place to protect against the loss, misuse, and alteration of the PI/SPDI under our control. Venbha iTs servers are accessible only to

authorized personnel and your Information is shared with employees and authorized personnel strictly on a 'need to know' basis. Venbha

iT periodically assesses, audits and updates its information security protocols and policies to achieve the highest standards on a

continuous and ongoing basis. You may review the Information you have provided to Venbha iT at any time. On your request, Venbha iT

will ensure that any PI/SPDI notified to be inaccurate or deficient, shall be corrected or amended. However, Venbha iT shall not be

responsible for the authenticity of the PI/ SPDI.

Notwithstanding anything contained in this Privacy Policy or elsewhere, Venbha iT shall not be held responsible for any loss, damage

or misuse of your PI/SPDI, if such loss, damage or misuse is attributable to a Force Majeure Event.

Employees/Relevant Individuals Obligations Consequences of Violations:

Every Venbha iT Employee/Relevant Individual, who deals with or comes into contact with Personal Data regardless of its origin, shall

have a responsibility to comply with the applicable law concerning data privacy and specific privacy practices. The Employee/Relevant

Individual should seek advice in the event of any ambiguity while dealing with Personal Data or in understanding this Policy. The

Employee/Relevant Individual shall be diligent and extend caution while dealing with Personal Data of others, in the course of

performance of his/her duties and shall also, at all times:

Prevent any un-authorized person from having access to any computer systems processing Personal Data, and especially:

un-authorized reading, copying, alteration, deletion or removal of data

un-authorized data input, disclosure, uploading, transmission/transfer of Personal Data

Abide by Venbha iT internal logical and physical security policies and procedures.

Ensure that authorized users of a data-processing system can access only the Personal Data to which their access right refers.

Keep a record of which personal data have been communicated, when and to whom.

Not provide any Personal Data to any third party without first consulting with his/her Manager or the Human Resources Department.

Ensure that Personal Data processed on behalf of a third party (client) can be processed only in the manner prescribed by such third

party.

Ensure that, during communication of Personal Data and transfer of storage media, the data cannot be read, copied or erased without

authorization.

Immediately, on becoming aware report and notify any vulnerabilities and privacy related breach/security breaches (including potential

risks).

Attend trainings on security and data privacy

Failure to comply with the Policy and applicable laws may have serious consequences and can expose both Venbha iT and the

Employee/Relevant Individual to damages, criminal fines and penalties. It is important to note that any non-compliance with this

Policy is taken very seriously by Venbha iT and may lead to initiation of appropriate disciplinary actions including but not limited

to Employee dismissal or Relevant Individual termination.

Retention and Revocation of Information:

It is Venbha iTs policy to retain certain Personal Data of the relevant individuals when they cease to be employed/ engaged by Venbha

iT. This Personal Data may be required for Venbha iTs legal and business purposes, including any residual activities relating to the

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 Venbha iT to fulfil any of its contractual or statutory

obligations.

We will retain your personal data only for as long as is necessary. We maintain specific records management and retention policies and

procedures, so that personal data is deleted after a reasonable time according to the following retention criteria:

We retain your data as long as we have an ongoing relationship with you (in particular, if you have an account with us)

We will only keep the data while your account is active or for as long as needed to provide services to you

We retain your data for as long as needed in order to comply with our global legal and contractual obligations

Once Venbha iT no longer requires the Personal Data, it is destroyed appropriately and securely or anonymized in accordance with the

law. Services transactional data is retained for three years.

Inquiries/Notification of Changes for Employees

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

Request access to the personal data we process about you: this right entitles you to know whether we hold personal data about you and,

if we do, to obtain information on and a copy of that personal data

Request a rectification of your personal data: this right entitles you to have your personal data be corrected if it is inaccurate or

incomplete

Object to the processing of your personal data: this right entitles you to request that Venbha iT no longer processes your personal

data

Request the erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such

personal data would no longer be necessary to achieve the purposes

Request the restriction of the processing of your personal data: this right entitles you to request that Venbha iT only processes your

personal data in limited circumstances, including with your consent

Request portability of your personal data: this right entitles you to receive a copy (in a structured, commonly used and machine-

readable format) of personal data that you have provided to Venbha iT, or request Venbha iT to transmit such personal data to another

data controller

You may contact Venbha iT at [info@venbhait.com](mailto:info@venbhait.com)