

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

<b>Document Control</b>			
<b>Prepared By</b> Vineet Kumar Chawla (Sr. Consultant IT)	<b>Reviewed By</b> Maruti Divekar (IT Head)	<b>Checked By</b> B P Rauka (CFO)	<b>Approved By</b> Mukund Kabra (Director)

<b>Document Modification History</b>							
SR #	Document	Version No.	Reviewed On	Checked On	Approved On	Effective Date	Authorized Signatory
1.	Data Privacy Policy	1.0	05 <sup>TH</sup> Mar 21	10 <sup>th</sup> Mar 21	10 <sup>th</sup> Mar 21	11 <sup>th</sup> Mar 21	
2.							
3.							

### Document Control

- This document is subject to version control and shall be managed by IT Head. Any request for amending this document shall be approved by Director. The IT Head shall review this document at least once in a year and/or when there is a significant change in technology adopted, business objectives, identified threats, legal environment, social climate and business processes.
- The document is available on Helpdesk Portal under Announcement and Server shared folder under AETL Policies and provided with HR Joining Kit, in non-editable pdf format and all the employees are expected to read and adhere to it. The approved and signed copies are available with IT Team, which can be used for audit purpose only. IT Team is responsible for maintaining updated copy of this document and its effective communication within Advanced Enzymes (AETL).

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

**Table of Contents**

1. **Overview ..... 3**

2. **Purpose ..... 3**

3. **Scope..... 3**

4. **Policy..... 4**

5. **Your Personal Data ..... 5**

6. **Purpose and Legal Basis do We use Your Personal Data ..... 6**

7. **Sharing of Your Personal Data with Third Parties ..... 7**

8. **Processing of your personal Data..... 7**

9. **Indemnification ..... 11**

10. **Policy Review..... 11**

11. **Roles & Responsibility Matrix (RACI) ..... 12**

12. **Roles and Responsibilities ..... 12**

13. **Risk for Non-Compliance ..... 13**

14. **ISMS Steering Committee Members ..... 12**

15. **AETL IT Helpdesk Contact Details..... 12**

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

## 1. Overview

Advanced Enzymes Ltd. (hereafter referred to as “AETL” or “the organization”) places great importance on security of your personal data and adhere to the strictest security and data protection standards. AETL has implemented technical and organizational security measures to guarantee the security of your personal data. Information is stored on secure networks and access is restricted to those employees and partners who are entitled to access our systems.

## 2. Purpose

The purpose of this policy is to maintain the privacy of and protect the personal information of employees, contractors, vendors, interns, associates, customers and business partners of Advanced Enzymes Ltd and ensure compliance with laws and regulations applicable to Advanced Enzymes Ltd.

This policy (the “Data Protection and Privacy Policy”) explains which personal data concerning you we collect when you visit our website (the “Website”), offices or take any of our services, when and why we collect the personal data, how we use them, the conditions of our disclosure to third parties, as well as how we secure the stored personal data.

## 3. Scope

This policy is applicable to all AETL employees, contractors, vendors, interns, associates, customers and business partners who may receive personal information, have access to personal information collected or processed, or who provide information to the organization, regardless of geographic location. All employees of AETL are expected to support the privacy policy and principles when they collect and / or handle personal information or are involved in the process of maintaining or disposing of personal information. This policy provides the information to successfully meet the organization’s commitment towards data privacy. All partner firms and any Third-Party working with or for AETL, and who have or may have access to personal information, will be expected to have read, understand and comply with this policy. No Third Party may access personal information held by the organization without having first entered into a confidentiality agreement.

The following officers have specific duties under this policy:

- Head of Internal Audits;
- Head of Information Technology; and
- Chief Executive Officer

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

#### 4. Policy

**Data Privacy Principles** This Policy describes generally acceptable privacy principles (GAPP) for the protection and appropriate use of personal information at AETL. These principles shall govern the use, collection, disposal and transfer of personal information, except as specifically provided by this Policy or as required by applicable laws:

- **Notice:** AETL shall provide data subjects with notice about how it collects, uses, retains, and discloses personal information about them.
- **Choice and Consent:** AETL shall give data subjects the choices and obtain their consent regarding how it collects, uses, and discloses their personal information.
- **Rights of Data subject:** Upon request from individuals AETL will remove/block your personally identifiable information from our database, thereby cancelling your registration. However, your information may remain stored in archive on our servers even after the deletion or the termination of your account.
- **Collection:** AETL shall collect personal information from data subjects only for the purposes identified in the privacy notice / SoW / contract agreements and only to provide requested product or service.
- **Use, Retention and Disposal:** AETL shall only use personal information that has been collected for the purposes identified in the privacy notice / SoW / contract agreements and in accordance with the consent that the data subject shall provide. AETL shall not retain personal information longer than is necessary to fulfil the purposes for which it was collected and to maintain reasonable business records. AETL shall dispose the personal information once it has served its intended purpose or as specified by the data subject.
- **Access:** AETL shall allow data subjects to make inquiries regarding the personal information about them, that AETL shall hold. However, considering the security of data, no direct access to their personal information for review, and/or update can be provided. Any modifications / updating in the data will be done by AETL.
- **Disclosure to Third Parties:** AETL shall disclose personal information to Third Parties / partner firms only for purposes identified in the privacy notice / SoW / contract agreements. AETL shall disclose personal information in a secure manner, with assurances of protection by those parties, according to the contracts, laws and other segments, and, where needed, with consent of the data subject.
- **Obligations for Sub-processor:** Where a processor (vendor or 3rd party acting on behalf of AETL's data processor) engages another processor (Sub-processor) for carrying out specific processing activities on behalf of AETL (controller), the same data protection obligations as set out in the contract or other legal act between AETL and the processor shall be imposed on the Sub-processor by way of a contract or other legal act as under IT ACT 2000 (Draft Data Privacy Bill 2018). Where the Sub-processor fails to fulfil its data protection obligations, the initial processor (relevant vendor or 3rd party acting on behalf of AETL's data processor) shall remain fully liable to AETL for the performance of that Sub-processor's obligations.
- **Security for Privacy:** AETL shall protect personal information from unauthorized access, data leakage and misuse.

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

- **Quality:** AETL shall take steps to ensure that personal information in its records is accurate and relevant to the purposes for which it was collected.
- **Monitoring and Enforcement:** AETL shall monitor compliance with its privacy policies, both internally and with Third Parties, and establish the processes to address inquiries, complaints and disputes.

## 5. Your Personal Data

Personal Data is information or an expression of opinion that identifies or may permit an individual to be identified.

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

### Categories of Personal Data do We Collect and Process:

We collect personal data of our employees, potential employees, clients, suppliers, business contacts, shareholders and website users. If the data we collect are not listed in this privacy statement, we will give individuals (when required by law) appropriate notice of which other data will be collected and how it will be used.

Specifically, the personal data we collect include the categories of personal data described in the sections, as well as any other categories of personal data referred to in this privacy statement or in other statements you have received.

Except for certain information that is required by law or by AETL policies, your decision to provide any personal data to us is voluntary. You will therefore not be subject to adverse consequences if you do not wish to provide us with your personal data.

However, please note that if you do not provide certain information, we may not be able to accomplish some or all of the purposes outlined in this privacy statement, and you may not be able to use certain tools and systems or avail services which require the use of such personal data.

If you provide us with personal data of another person (for instance, a potential employee/referral), you are responsible for ensuring that such person is made aware of the information contained in this privacy statement and that the person has given you his/her consent for sharing the information with AETL.

The above-mentioned categories of personal data have been obtained either directly from you (for example, when you provide information to sign up for a newsletter or register to comment on a forum website) or indirectly from certain third parties (for example, through our website's technology). Such third parties include our affiliates, public authorities, public websites and social media, suppliers and vendors.

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

## 6. Purpose and Legal Basis do We use Your Personal Data

AETL uses your personal data only where required for specific purposes. Please view the table below for (i) a list of the purposes for which AETL uses your personal data and (ii) an overview of the legal basis for each such purpose.

<b>Purpose</b>	<b>Legal basis</b>
Managing our contractual and/or employment relationship with you.	Necessary for the performance of a contract to which you are a party.
Recruitment.	justified based on our legitimate interests for ensuring that we recruit the appropriate employees.
Facilitating communication with you (including in case of emergencies, and to provide you with requested information).	Justified on the basis of our legitimate interests for ensuring proper communication and emergency handling within the organization.
Operating and managing our business operations.	justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.
Complying with legal requirements.	Necessary for the compliance with a legal obligation to which we are subject.
Monitoring your use of our systems (including monitoring the use of our website and any apps and tools you use).	Justified on the basis of our legitimate interests for ensuring that you receive an excellent user experience and our networks and information are secure.
Undertaking data analytics, i.e. applying analytics to business operations and data to describe, predict and improve business performance within AETL and/or to provide a better user experience.	Justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.
Marketing our products and services to you (unless you objected against such processing, as further described in the policy).	Justified on the basis of our legitimate interests for ensuring that we can conduct and increase our business.

Where the above table states that we rely on our legitimate interests for a given purpose, we are of the opinion that our legitimate interests are not overridden by your interests, rights or freedoms, given (i) the transparency we provide on the processing activity, (ii) our privacy by design approach, (iii) our regular privacy reviews and (iv) the rights you have in relation to the processing activity.

We will process your personal data for the purposes mentioned above based on your prior consent, to the extent such consent is mandatory under applicable laws. Your consent is given once you avail our services or taken employment with AETL under a contract.

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.

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

## 7. Sharing of Your Personal Data with Third Parties

We may transfer personal data to our service providers, professional advisors, public and governmental authorities or third parties in connection with a (potential) corporate or commercial transaction. Such third parties may be located in other countries. 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 AETL's internal policies.

Unless you are otherwise notified, transfers of your personal data will take place in accordance with the appropriate international data transfer mechanisms and standards.

### Sensitive Data

We will ask for limited sensitive data, if you are seeking employment with us or availing any services like Home Loan etc. The data like criminal convictions and offences (including information about suspected criminal activities) etc. is sourced by Third Party appointed by us for background verification.

### Data Security

We maintain organizational, physical and technical security arrangements for all the personal data we hold. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements considering the risks associated with the categories of personal data and the processing we undertake.

We adopt market leading security measures to protect your personal data.

We are working towards an ISO27001 certification, which indicates that we will adhere to the highest and strictest information security standards. This is a security standard awarded by the British Standards Institution ("BSI") that serves as international certification that organization adheres to the highest and strictest standards. This certification is the only auditable international standard that defines the requirements for an Information Security Management System ("ISMS"), and confirms that AETL's processes and security controls provide an effective framework for protecting our clients' and our own information.

We have regular penetration testing performed by a third-party provider, which continues to show the strength of our technical defenses.

## 8. Processing of your personal Data

We have operations across India, your personal data we collect may be transferred or be accessible within India throughout AETL's India business and between its entities and affiliates.

Any such transfers throughout AETL's business take place in accordance with the applicable data privacy laws.

### Retention Period of Your Personal Data

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 are 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).

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

- 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 legal and contractual obligations.

#### **Your Rights with Respect to Processing of Personal Data**

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. Direct access to our IT systems and applications will not be provided.
- 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 AETL 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 AETL 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 excel and machine-readable format) of personal data that you have provided to AETL, or request AETL to transmit such personal data to another data controller.

To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by contacting AETL's Data Privacy Officer at [it@advancedenzymes.com](mailto:it@advancedenzymes.com). Please note that this will not affect AETL's right to process personal data obtained prior to the withdrawal of your consent, or its right to continue parts of the processing based on other legal bases than your consent.

#### **Use of Your Personal Data when you visit AETL'S website**

In addition to the information set out above, the following sections describe how we use personal data

when you visit AETL's website:

AETL collects personal data at its websites in two ways:

- (1) directly (for example, when you provide personal data to sign up for a newsletter or register to comment on website); and
- (2) indirectly (for example, through our website's technology).

We may collect and process the following personal data:

- Personal data that you provide by filling in forms on our website. This includes registering to use the website, subscribing to services. The data we collect is
  - Name
  - Company name
  - Industry Sector
  - City



<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

- Phone No.
- Query
- Email id
- Profile
- Experience
- Service type
- Current CTC
- Details of Fixed Assets
- Photographs
- Identity proofs (Aadhar, Pan, passport)

- If you contact us, we may keep a record of that correspondence.
- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- We collect data from Facebook, LinkedIn, Blogs
- Any postings, comments or other content that you upload or post to an AETL website.
- Our website collects personal data about your computer, including (where available) your IP address, operating system and browser type, for system administration, to filter traffic, to look up user domains and to report on statistics.
- Details of your visits to our website, the pages you view and resources you access or download, including but not limited to, traffic data, location data, weblogs and other communication data. Please see the Cookies section below for more information.

### **Third Party Links on websites**

Our website may include:

- Links to and from the sites of our other websites, partner networks.
- Certain programs (widgets and apps) of third parties. Where this is the case, note that such third parties may process your personal data collected through such programs for their own purposes.

We do not accept any responsibility or liability for such third parties' sites or programs. Please check such third parties' terms of use and privacy statements before using and providing any information to such third parties' sites and programs.

### **Use of personal data that we collect from our websites**

We use personal data for the purposes described in the section above, as well as to provide you with information you request, track consignments, make payments, consignment pick up request, business process query, process online job applications, and for other purposes which we would describe to you at the point where it is collected. For example:

- Links to and from the sites of our partner networks, advertisers and affiliates.
- Certain programs (widgets and apps) of third parties. Where this is the case, note that such third parties may process your personal data collected through such programs for their own purposes.

We analyse your IP and browser information to determine what is most effective about our website, to help us identify ways to improve it and make it more effective.

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

**Use of your personal Data when you visit our offices:**

In addition to the information set out above, this section describes how we use personal data when you visit AETL offices.

AETL may collect, use, transfer, disclose and otherwise process your personal data in the context of facilitating communication with you (including in case of emergencies), operating and managing AETL’s business operations, complying with legal requirements, monitoring your use of AETL’s systems, undertaking data analytics and recruitment.

We process your personal data when visiting our offices. Your personal data is captured at Entry Gate, through CCTV and access management systems (in case such CCTV and access management systems are active.)

AETL processes your personal data for the purposes set out in this privacy statement for one or more of the following reasons: (i) because AETL is required to do so for compliance with a legal obligation to which it is subject, (ii) because such information is necessary for the performance of a contract to which you are a party, (iii) because the processing is necessary for the purposes of the legitimate interests pursued by AETL or by a third party (as described in the last sentence of this paragraph), or (iv) where necessary in order to protect the vital interests of any person. AETL has legitimate interests in collecting and processing personal data, for example: (1) to ensure that AETL’s networks and information are secure, (2) to administer and generally conduct business and (3) to prevent fraud.

Access to your personal data within AETL will be limited to those employees who have a need to know the information for the purposes described in this privacy statement, which may include personnel in Security, HR, IT, Compliance, Legal, Finance, Sales, Marketing and Accounting, Corporate Investigations and Internal Audit. All employees within AETL will generally have access to your business contact information (e.g. name, position, telephone number and e-mail address).

**Use of Personal Data for Marketing Purposes: -**

In addition to the information set out above, the following sections describe how we use personal data for marketing purposes:

**Sources of marketing data.**

The bulk of the personal data we collect and use for marketing purposes relates to customer, customer referrals, individual employees of our clients and other companies with which we have an existing business relationship. We may also obtain contact information from public sources, including content made public at social media websites, to make an initial contact with a relevant individual at a client or other company.

**Analyse personal data and data from other sources**

We may combine data from publicly available sources, and from our different e-mail, website, and personal interactions with you (this includes information collected across our different websites such as our careers and corporate sites and information collected when you sign-up or log on to our sites or connect to our sites using your social media credentials (such as LinkedIn, Facebook). We combine this data to better assess your experience with AETL and to perform the other activities described throughout our privacy policy.

**Share personal data with third parties**

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

In addition to the third parties mentioned in the section above, we may share your personal data with marketing agencies.

### **Your Rights Regarding Marketing Communications**

#### **Your Data and Content Creation Activities**

AETL partners with advertising agencies for content production. We may process your personal data for these TV, film, marketing, advertising or other related content creation, production and distribution activities.

- The personal data that we process for production purposes include images and footage of you and may include your location at the time of recording.
- If you are a member of public, we will diligently attempt to make you aware of our location and recording activities in advance and will give you an opportunity not to enter the location where recording is taking place and participate in them.
- If you are a focus of our recording activities (i.e. a contributor or talent such as an interviewee, extra or actor, as opposed to a member of public) we will also collect and process your name, contact information and any other information provided in any pre-recording questionnaires and/or release forms, such as next of kin details.

## **9. Indemnification**

a) We believe information gathered should only be used to help us provide you with better services. But due to the existing regulatory environment, we cannot ensure that all of your private communications and other personal information will never be disclosed in ways not otherwise described in this Privacy Policy. Therefore, although we use industry standard practices to protect your privacy, we do not promise, and you should not expect, that your personal information or private communications will always remain private. Notwithstanding the above we will not disclose any of your personally identifiable information to third parties unless:

b) You (customers, vendors, employees, channel partners) hereby agrees and undertakes to keep AETL and its Directors, employees harmless and fully indemnified, at all times, therefore, against any or all claims, liabilities, damages losses, costs, charges, expenses, proceedings and actions of any nature whatsoever made or instituted against AETL (Company), its Directors & Employees or otherwise, directly or indirectly, by reasons of breach/loss of your personal data.

## **10. Policy Review**

This policy is reviewed annually or as and when it required; however, control mechanisms exist to ensure compliance activities are built-in organisational policies and practices.

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

## 11. Roles & Responsibility Matrix (RACI)

Activity \ Role	IT Head	ISMS Steering Committee	Internal Users	External Users	Exempted
Authoring of this document	RA	RA	-	-	-
Approval of this document	I	CI	-	-	-
Sign-off of this document	CI	CI	-	-	-
Application of this document	RA	RA	RA	RA	-

R	Responsible
A	Accountable
C	Consulted
I	Informed

## 12. Roles and Responsibilities

Below are the specific roles and responsibilities for the defined policy:

- **Head of Information technology**
  - Shall ensure that IT infrastructure and data is secured.
  - Conduct VAPT to bridge any gaps in IT Security.
  - Monitor the flow of data/information In-Out of AETL network and report to Director.
- **MD/Director Roles & Responsibilities**
  - MD/Director must establish and nurture a security-minded culture across the board, including employees, partners and even outside vendors.
  - Its MD/Director's responsibility how to equip the organization to deal with a fast-moving environment, where things happen that you've never seen before.
  - MD/Director must ensure their organizations provide adequate funding to manage all those risks.
- **Employees**
  - Shall not share the data/documents of customers/ vendors with Third Party.
  - Shall not copy the data on to their personal emails/mobiles/ laptops/tablets.

<b>Policy Domain</b>	<b>Data Privacy Policy</b>	<b>Creation Date</b>	10 <sup>th</sup> Feb 2021
		<b>Classification</b>	Internal
		<b>Version</b>	1.0
		<b>Doc. Owner</b>	IT Head

### 13. Risk for Non-Compliance

Risks arising due to non-compliance with this policy include, but not limited to:

- Loss of Personal Data of customers, employee, vendors and other Partners.
- Unauthorized Sharing of Personal Data.
- Loss of Reputation of the Organization.

Breaching this policy may result in disciplinary action wherein serious breaches may result in suspension or termination of employment or association.

### 14. ISMS Steering Committee Members

1. Mukund Kabra (Director)
2. B. P. Rauka (CFO)
3. Maruti Divekar (IT Head)

### 15. AETL IT Helpdesk Contact Details

- Logging an online support request: <http://192.168.2.7:8080>
- Email: [it.helpdesk@advancedenzymes.com](mailto:it.helpdesk@advancedenzymes.com)
- Telephone: **022 41703234**

*advanced enzymes*  
Where ENZYME is Life