

**22.0 Environment, Social & Governance**  
**P22.17 Privacy & Data Protection Policy**  
**Vardhman Group**

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### **22.17.1. Objectives**

The Vardhman Group recognizes the importance of having effective and meaningful privacy protections in place when it collects, uses, and discloses 'Personal Information'. These protections are necessary to instill confidence in Vardhman Group's membership, whose employees may furnish 'Personal Information' to Vardhman Group and are themselves subject to local privacy and data protection laws, as well as to ensure Vardhman Group's compliance with such laws.

Vardhman Group always ensures the use of all the protective measures when handling 'Personal Information' under its control or in its possession, both from a regulatory compliance and commercial perspective. The purpose of this policy statement on Privacy and Data Protection ("Policy") is to establish privacy standards applicable throughout Vardhman Group. In addition to the Policy, Vardhman Group will comply with any more restrictive local privacy and data protection laws or standards that may apply as per statutory act ([Information Technology Act, 2000 & Information Technology \(Amendment\) Act, 2008](#)) / local statute.

### **22.17.2. Scope & Applicability**

This policy applies to the collection, use, and disclosure of 'Personal Information' by Vardhman Group or authorized third-party agents in any format, including electronic, paper, or verbal. Vardhman Group may develop more detailed guidance or procedures to address discrete privacy concerns involving individual Vardhman Group programs, activities, or initiatives, as appropriate.

This Privacy and Data Protection Policy extends to all suppliers and third-party service providers that process Personal Information on behalf of Vardhman Group. Suppliers must adhere to the same standards of data protection as outlined in this policy and are subject to regular assessments to ensure compliance.

This policy shall apply to each & every employee (Staff & above cadre only) of Vardhman Group.

### **22.17.3. Definition**

#### **1. Personal Information:**

Information that on its face or in combination with other information in Vardhman Group's control or possession identifies an individual, regardless of the format in which it is displayed (paper, electronic, etc.). This could include information, such as name and contact details, and other work-related particulars, of persons representing existing or potential Vardhman Group members, persons responding to Vardhman Group surveys and research tools, and persons appearing on Vardhman Group's website.

This Policy Statement supersedes any previous policy of Vardhman Group concerning Privacy and Data Protection. In the event of any conflict or inconsistency between this Policy Statement and any other materials previously distributed by Vardhman Group, this Policy Statement shall supersede.

‘Personal Information’ excludes information that Vardhman Group cannot reasonably attribute to an individual or could only attribute to an individual after expending disproportionate effort or expense, or information that has been aggregated or rendered anonymous through the application of coding or other similar techniques.

## **2. Sensitive Personal Information:**

Personal Information pertaining to an individual’s race, ethnic origin, health, sexual orientation, religious, philosophical, or political beliefs, commission of criminal offences, or other information that has been expressly designated as such under local laws applicable to Vardhman Group or its clients.

### **22.17.4. Policy Overview**

This Policy would define the coverage of Privacy and Data Protection.

#### **1. Legitimate and Fair Use:**

Vardhman Group should only collect, use, or disclose ‘Personal Information’ by lawful and fair means, in accordance with applicable laws, and fully observe the legal rights of individuals. Vardhman Group should only obtain or use ‘Personal Information’ in order to fulfill Vardhman Group’s legitimate business purposes, such as (but not limited to) evaluating applications for membership with Vardhman Group (including any of its individual programs), maintaining Vardhman Group membership accounts, maintaining regular communications with Vardhman Group members, furnishing services to members, complying with applicable legal and regulatory requirements, and protecting Vardhman Group’s legal rights and interests. Vardhman Group should use the minimum amount of ‘Personal Information’ necessary and, whenever possible, should rely instead upon anonymous or aggregated information to accomplish its business objectives. Vardhman Group prohibits any unauthorized use of ‘Personal Information’ by Vardhman Group personnel or its agents.

#### **2. Notice to Individuals:**

Vardhman Group should strive to ensure that its collection and use of ‘Personal Information’ remains transparent to the relevant individuals. Vardhman Group should take reasonable steps to furnish individuals with an appropriate form of notice to inform them about

- a. the purposes for which Vardhman Group collects and uses the ‘Personal Information’,
- b. how to contact Vardhman Group if the individual has any issues or concerns about Vardhman Group’s use of the ‘Personal Information’,
- c. third parties with whom Vardhman Group shares the ‘Personal Information’ (including international transfers of the ‘Personal Information’ and disclosures within the Vardhman Group network or across Vardhman Group programs), and

- d. the choice and means Vardhman Group offers individuals for limiting the use and disclosure of the 'Personal Information' unless to furnish notice would be impracticable or impossible under the circumstances.

Notices should be provided in plain language, take a written form, and be furnished to individuals before their 'Personal Information' is first collected or, if that is not possible, as soon as practicable thereafter. Individual Vardhman Group programs should decide the appropriate mechanism for imparting notice taking into account the relationship with the relevant individual, the circumstances under which the 'Personal Information' is collected, and other relevant factors. For the avoidance of doubt:

- a. Where Vardhman Group obtains 'Personal Information' from individuals by means of Vardhman Group application or membership forms, Vardhman Group should include within the pertinent documentation appropriate written notices.
- b. Where Vardhman Group captures 'Personal Information' by means of benchmarking surveys, questionnaires, and related research tools, Vardhman Group should include within the surveys and tools appropriate written notices and only proceed to collect and use the 'Personal Information' captured via such devices where the respondent has agreed to such processing. In the absence of such an agreement, Vardhman Group should not process the 'Personal Information' contained in the relevant survey or tool.
- c. Where Vardhman Group obtains 'Personal Information' from individuals online, Vardhman Group should furnish such individuals with an appropriate form of notice that takes into account the manner by which the Information is collected, which may take the form of an online privacy statement, policy, or other informational disclosures.

### 3. Individual Choice:

Vardhman Group believes individuals should be able to decide how Vardhman Group collects and uses their 'Personal Information' to the greatest extent possible. Whenever possible or required by law, Vardhman Group should obtain the consent of an individual before collecting or processing their 'Personal Information' and, where an individual withholds or later withdraws their consent, respect their indicated wishes. Vardhman Group will strive in particular to obtain the consent of individuals where Vardhman Group collects and processes 'Sensitive Personal Information', while recognizing it may in some instances be necessary to process such Information to protect adequately Vardhman Group's legal rights and interests. When seeking an individual's consent, Vardhman Group should provide the individual with sufficient information to allow the individual to make an informed decision, allow the individual to later withdraw their consent, and refrain from penalizing the individual for withholding their consent. For the avoidance of doubt:

- a. Vardhman Group should ensure that any benchmarking surveys, questionnaires, and related research tools capturing 'Personal Information' contain a mechanism for securing the consent of the respondent and that the relevant individual has affirmatively indicated their consent.

- b. Vardhman Group should allow individuals to decide whether their 'Personal Information' will be used for other purposes besides those appearing in any notices furnished to the individual, other than where necessary to protect Vardhman Group's legal rights and interests.
- c. Vardhman Group should respect an individual's decision not to receive marketing and promotional communications from Vardhman Group.

#### **4. Information Integrity:**

Vardhman Group should only use 'Personal Information' in accordance with any notices furnished to or consents obtained from individuals, and should not later process 'Personal Information' for any additional, incompatible purposes unless it has re-notified the individual or where required or expressly permitted by law. Vardhman Group should only collect 'Personal Information' that is relevant in light of the business purposes the 'Personal Information' is meant to serve and employ reasonable means to keep the 'Personal Information' accurate, complete, up-to-date, and reliable. Vardhman Group materials and forms used to collect 'Personal Information' should be prepared in such a manner that only pertinent 'Personal Information' is captured.

#### **5. Information Security:**

Vardhman Group should implement appropriate administrative, technical, and organizational measures, including those appearing in Vardhman Group's Information Security Policy, to safeguard the 'Personal Information' under its control or in its possession against loss, theft, misuse, unauthorized access, modification, disclosure, or destruction. Vardhman Group should ensure that any 'Sensitive Personal Information' it holds is subject to safeguards reflecting the correspondingly greater harm that would arise from its unauthorized use or disclosure. Vardhman Group should only retain 'Personal Information' for as long as reasonably required to serve Vardhman Group's legitimate business needs and the 'Personal Information' subsequently should be made anonymous, deleted, or destroyed.

Vardhman Group should restrict access to 'Personal Information' to Vardhman Group personnel or third- parties who have a legitimate business need for such access given their roles and responsibilities. Vardhman Group should only disclose 'Personal Information' to third parties who expressly agree to and are capable of protecting the 'Personal Information' to the same degree as Vardhman Group. In the event Vardhman Group learns or reasonably believes that a third-party is failing to apply adequate privacy protections to the 'Personal Information', Vardhman Group should take immediate steps to rectify the situation.

#### **6. Information Access and Correction:**

Vardhman Group should allow individuals to review in an intelligible format the 'Personal Information' that Vardhman Group holds relating to them unless such access would be inappropriate or unnecessary. Instances, where access may legitimately be denied, include where such access would materially prejudice Vardhman Group's legitimate business interests or legal rights, adversely affect the privacy rights of third parties, or impose a disproportionate burden upon Vardhman Group given the attendant privacy risks to the individual. Where access is refused, Vardhman Group will endeavor to inform individuals as to the reasons for the denial. In the event

that an individual establishes to Vardhman Group's satisfaction that their 'Personal Information' is incorrect, Vardhman Group should promptly correct or amend the relevant 'Personal Information'.

#### **7. Disclosures to Third Parties:**

Vardhman Group places substantial importance on the confidentiality of 'Personal Information'. For that reason, Vardhman Group should inform individuals whenever their 'Personal Information' may be disclosed to third parties, if practicable. Vardhman Group will not disclose 'Personal Information' to third parties except where it serves a legitimate business purpose and where reasonable assurances are given that the 'Personal Information' will be legitimately processed and appropriately protected. Vardhman Group should provide individuals with notice of any third parties with whom it shares "Personal Information" for the third party's direct marketing purposes.

#### **8. International Transfers of 'Personal Information':**

Prior to the international transfer of 'Personal Information', Vardhman Group would implement any additional measures that are required under any applicable laws regulating such transfer and only transfer 'Personal Information' in furtherance of Vardhman Group's own legitimate business needs.

#### **9. Dishonest and fraudulent intentions are prohibited:**

Below mentioned activities with a dishonest and fraudulent intention are prohibited and no one should indulge in any of these.

- a. accessing or securing access to a computer, or computer system, or computer network, or computer resource
- b. downloading, copying, or extracting any data, computer database, or information from such computer, computer system, or computer network including information or data held or stored in any removable storage medium;
- c. introducing or causing to be introduced any computer contaminant or computer virus into any computer, computer system, or computer network;
- d. damaging or causing to be damaged any computer, computer system or computer network, data, computer database, or any other programs residing in such computer, computer system, or computer network;
- e. disrupting or causing disruption of any computer, computer system, or computer network;
- f. denying or causing the denial of access to any person authorized to access any computer, computer system, or computer network by any means;
- g. providing any assistance to any person to facilitate access to a computer, computer system, or computer network in contravention of the provisions of the statutory act ([Information Technology Act, 2000 & Information Technology \(Amendment\) Act, 2008](#)), rules or regulations made thereunder;



- h. Charging the services availed of by a person to the account of another person by tampering with or manipulating any computer, computer system, or computer network.

#### 10. Reporting Cyber security incidents:

It needs to be ensured that any cyber security incidents need to be reported immediately to the concerned IT Security personnel who in turn would report to Cert-In (Indian Computer Emergency Response Team). Below are some of such security incidents that need to be reported:

- a. Targeted scanning/ probing of critical networks/ systems
- b. Compromise of critical systems/information
- c. Unauthorized access to IT system/ data
- d. Defacement of a website or intrusion into a website and unauthorized changes such as inserting malicious code, links to external websites, etc.
- e. Malicious code attacks such as the spreading of viruses/ worms/ Trojans/ Botnets/ Spyware
- f. Attack on servers such as Database, mails, and DNS and network devices such as routers
- g. Identify theft, spoofing, and phishing attack
- h. Denial of Service (DoS) and Distributed Denial of Service (DDoS) attack
- i. Attacks on Critical Infrastructure, SCADA (Supervisory control and data acquisition) systems and wireless network
- j. Attacks on applications such as E-Governance, E-Commerce, etc.
- k. The above reporting shall be intimated to CERT-In via email: **incident@cert-in.org.in**. Other voluntary incidents shall be reported via email: **info@cert-in.org.in**.
- l. The company designates the Data Protection Officer (DPO) as the primary point of contact for all privacy-related issues. The DPO is responsible for overseeing the implementation of the Privacy and Data Protection Policy, monitoring compliance, and acting as a liaison with regulatory authorities.
- m. The Privacy and Data Protection Policy is an integral part of the company's group-wide risk and compliance management framework. Regular privacy impact assessments will be conducted to identify potential risks to Personal Information and to integrate privacy controls into our risk management processes.
- n. Internal audits of privacy policy compliance will be carried out periodically to ensure adherence to the policy and to identify areas for improvement. These audits will be conducted



by the internal audit team and overseen by the DPO. The results will be reported to senior management and the board of directors.

- o. The company will engage independent third-party auditors to conduct annual audits of our compliance with this Privacy and Data Protection Policy. The findings of these audits will be reviewed by the DPO and used to drive continuous improvement in our privacy practices.

## 11. Compliance:

Vardhman Group would maintain an active program to ensure compliance with and maintain awareness about the Policy. The company maintains a zero-tolerance policy for breaches of the Privacy and Data Protection Policy. Any employee found to have violated the policy will be subject to disciplinary action, up to and including termination of employment. This stance extends to suppliers and third-party service providers.

For the purpose that Vardhman Group is compliant with the Policy, during induction, concerned HR / IR Teams of Corporate & Units would take a declaration/confirmation from each & every employee (Staff & above cadre only) of Vardhman Group that they have read this Policy and would comply with it.

## 12. Enforcement & Complaint Resolution:

Vardhman Group is committed to assisting individuals in protecting their privacy and in providing opportunities to raise concerns about the processing of their 'Personal Information'. Any complaints relating to this policy should be raised to Vardhman Group's Legal team at [pankajgupta@vardhman.com](mailto:pankajgupta@vardhman.com).

### 22.17.5. Governance

- The Environment, Social & Governance (ESG) Committee of the Board shall govern the Privacy & Data Protection Policy.
- A designated committee oversees the implementation and adherence to this policy.
- This committee is responsible for periodic assessments and reporting compliance to the management.

### 22.17.6. Policy Review

- This policy will be reviewed As & When needed.
- The policy will be reviewed to ensure it remains up-to-date, effective, and compliant with evolving legal, regulatory, and operational requirements. The review will focus on ensuring the protection of personal data and the safeguarding of privacy in accordance with applicable regulations, while aligning with the organization's core values and long-term objectives, particularly in relation to data privacy and security.