



Data Protection & Privacy Policy

[Based on the requirements of ISO /IEC
27001:2013]

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Shyam Metalics & Energy Limited

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ISMS Framework

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Data Protection & Privacy Policy

This document outlines the procedures of “Data Protection & Privacy Policy”

1. Document Control

Document Name:		Data Protection & Privacy Policy	
Document Id:		ISMS.42	
Brief Description		Best practice guidelines for control, protection and privacy of personal identifiable information	
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2. Overview

The data protection procedure includes standards to be used for effective execution of data protection and privacy mechanism.

Shyam Metalics & Energy Limited This document is intended to provide an overview of the organization's data protection and privacy roadmap. This document is to be used as reference for all **Shyam Metalics & Energy Limited's** employees to clearly understand the standards and procedures put in place to protect organizational data.

3. Scope

This Procedure sets the minimum standard and shall guide all **Shyam Metalics & Energy Limited's** employees and Agents even if local law is less restrictive. Supplemental procedures and practices will be developed as needed to meet the local legal or departmental requirements. Supplemental procedures and practices may provide for more strict or specific privacy and protection standards than are set forth in this Procedure.

4. Statement

Shyam Metalics & Energy Limited is committed to protecting the privacy and confidentiality of Personal Information about its employees, customers, business partners and other identifiable individuals. **Shyam Metalics & Energy Limited** 's procedures, guidelines and actions support this commitment to protecting Personal Information. Each employee bears a personal responsibility for complying with this Procedure in the fulfillment of their responsibilities at **Shyam Metalics & Energy Limited**.

5. Details

Shyam Metalics & Energy Limited respects the privacy of its employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates for employment and recognizes the need for appropriate protection and management of Personal Information. **Shyam Metalics & Energy Limited** is guided by the following principles in Processing Personal Information:

- Notice
- Choice
- Accountability for onward transfer
- Security

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- Data integrity and purpose limitation
- Access
- Recourse, Enforcement and Liability

5.1 Notice

When collecting Personal Information directly from individuals, **Shyam Metalics & Energy Limited** strives to provide clear and appropriate notice about the:

- Purposes for which it collects and uses their Personal Information
- Types of non-Agent third parties to which **Shyam Metalics & Energy Limited** may disclose that information.

5.2 Choice

Generally, **Shyam Metalics & Energy Limited** offers individuals a choice regarding how they Process Personal Information, including the opportunity to choose to opt-out of further Processing or, in certain circumstances, to opt-in. However, explicit consent from individuals is not required when Processing Personal Information for:

- Purposes consistent with the purpose for which it was originally collected or subsequently authorized by the individual,
- Purposes necessary to carry out a transaction relationship,
- Purposes necessary to comply with legal requirements, or
- Disclosure to an Agent

5.3 Accountability for onward transfer

In regard to the transfer of Personal Information to either an Agent or Controller, **Shyam Metalics & Energy Limited** strives to take reasonable and appropriate steps to:

- Transfer such Personal Information only for specified purposes and limit the Agent or Controller's use of that information for those specified purposes,
- Obligate the Agent or Controller to provide at least the same level of privacy protection as is required by this Procedure,
- Help ensure that the Agent or Controller effectively Processes the Personal Information in a manner consistent with its obligations under this Procedure,
- Require the Agent or Controller to notify **Shyam Metalics & Energy Limited** if the Agent or Controller determines it can no longer meet its obligation to provide the same level of protection as is required by this Procedure, and Upon notice from the Agent or Controller, take further steps to help stop and remediate any unauthorized Processing.

5.4 Security

Shyam Metalics & Energy Limited takes reasonable and appropriate measures to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the Personal

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Information.

5.5 Data Integrity & Purpose Limitation

Shyam Metalics & Energy Limited will only process Personal Information in a way that is compatible with the purpose for which it has been collected or subsequently authorized by the individual. **Shyam Metalics & Energy Limited** shall take steps to help ensure that Personal Information is accurate, reliable, current and relevant to its intended use.

5.6 Access

Shyam Metalics & Energy Limited provides individuals with reasonable access to their Personal Information for purposes of correcting, amending or deleting that information where it is inaccurate or has been processed in violation of the **Shyam Metalics & Energy Limited's** data privacy principles.

5.7 Recourse, Enforcement and Liability

Violation of this Procedure by an employee or contractor of **Shyam Metalics & Energy Limited** will result in appropriate discipline up to and including termination. Violation by an Agent, Controller or other third party of this Procedure or **Shyam Metalics & Energy Limited's** privacy requirements will result in the exercise of appropriate legal remedies available at law or in equity including termination for material breach of contract.

6. Purpose of collecting and use of personal information

Shyam Metalics & Energy Limited may from time to time process certain Personal Information from or about employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates for employment, including information recorded on various media as well as electronic data.

Shyam Metalics & Energy Limited will use that Personal Information to provide customers, business partners, vendors, service partners and suppliers with information and services and to help **Shyam Metalics & Energy Limited** personnel better understand the needs and interests of these customers, business partners, vendors, service partners and suppliers. Specifically, **Shyam Metalics & Energy Limited** uses information to help complete a transaction or order, to facilitate communication, to market and sell products and services, to deliver products/services, to bill for purchased products/services, and to provide ongoing service and support. Occasionally **Shyam Metalics & Energy Limited** personnel may use Personal Information to contact customers, business partners, vendors, service partners and suppliers to complete surveys that are used for marketing and quality assurance purposes.

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Shyam Metalics & Energy Limited may also share Personal Information with its business partners, vendors, service providers and suppliers to the extent needed to support the customers' business needs. Suppliers are required to keep confidential Personal Information received from **Shyam Metalics Limited** and shall not use it for any purpose other than as originally intended or subsequently authorized or permitted.

Shyam Metalics & Energy Limited also collects Human Resources Data in connection with administration of its Human Resources programs and functions and for the purpose of communicating with its employees. These programs and functions may include compensation and benefit programs, employee development planning and review, performance appraisals, training, business travel expense and tuition reimbursement, identification cards, access to **Shyam Metalics & Energy Limited** facilities and computer networks, employee profiles, internal employee directories, Human Resource record keeping, and other employment related purposes. **Shyam Metalics & Energy Limited** also collects and uses Personal Information to consider candidates for employment opportunities within **Shyam Metalics & Energy Limited**. Human Resources Data may be shared with third party vendors and service providers for the purpose of enabling the vendor or service provider to provide service and/or support to **Shyam Metalics & Energy Limited** in connection with these Human Resources programs and functions. **Shyam Metalics & Energy Limited** will not share Human Resources Data with third parties for non-employment related purposes. **Shyam Metalics & Energy Limited** requires third parties receiving Personal Information to apply the same level of privacy protection as contained in this Procedure and as required by applicable law

7. Administration

7.1 Roles And Responsibilities

Responsibility for compliance with this Procedure rests with the heads of the individual functions, business units and departments together with any individual employees collecting, using or otherwise Processing Personal Information. Business unit, function and department heads, in coordination with the Legal Department, are responsible for implementing further standards, guidelines and procedures that uphold this Procedure, and for assigning day-to-day responsibilities for privacy protection to specific personnel for enforcement and monitoring.

7.2 Implementation

This Procedure is meant to be implemented in conjunction with supplementary data privacy policies specific to a region, country or department, if required. These supplementary data privacy policies will account for differences in data protection requirements by jurisdiction or function and will specify individual roles and responsibilities. **Shyam Metalics & Energy Limited** business units, functions or facilities will implement supplementary data privacy policies as required to be in compliance with applicable laws.

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7.3 Interpretation

In the event of any conflict between this Procedure and any supplemental data privacy guidelines, this Procedure will supersede the supplemental data privacy guidelines to the extent that the supplemental data privacy guidelines are less restrictive. Local data privacy guidelines may provide for stricter data privacy and protection standards than are set forth in this Procedure. In the event local data privacy law provides for stricter data privacy and protection than this Procedure, the local data privacy law will supersede this Procedure in that jurisdiction to the extent necessary to comply with stricter local law.

8. Enforcement

All users of **Shyam Metalics & Energy Limited** who violate guidelines stated in this policy may be subject to appropriate corrective action, including disciplinary measures.

Reference to ISO27002:2013

A.18.1.4

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