
PRIVACY POLICY

RADIAN CHEMICAL PRODUCTS PRIVATE LIMITED

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Radian Chemical Products Private Limited, a company incorporated under the Companies Act, 2013, having its office at C-102, Platinum, C.D. Barfiwala RD, Andheri West, Mumbai, Maharashtra, India, 400058,, (“**Company**” or “**we**” or “**us**” or “**our**”) is committed to respecting the privacy of every person who shares Personal Data or Information (as defined hereinafter) with the Company. Your privacy is important to us and we strive to take reasonable care in the protection of the Personal Data or Information we receive from you. Accordingly, pursuant to the Information Technology Act, 2000 (“**IT Act**”) and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“**IT SPDI Rules**”) as may be amended from time to time, the Company has framed the Privacy Policy (as defined hereinafter).

1. SCOPE AND APPLICABILITY OF THIS POLICY

This privacy policy, as amended from time to time (“**Privacy Policy**” or “**Policy**”) is effective from and applies to (a) the Company; (b) any persons who are employed with the Company and are on the payroll of the Company, with no pre-established time limits or expectations for their tenure with the Company and includes a probationer (“**Employees**”); (c) all persons who are temporarily hired for a fixed pre-established, limited period, usually for work during peak workloads or engaged for specific projects at the Company and includes directors, other than whole-time directors, by whatever name called, consultants, retainers, fixed term employees, casual employees and such other temporary / contractual resources who may or may not be on the Company’s payroll but, in any case, are not considered Employees (“**Temporary / Contractual Resources**”); (d) clients of the Company; and (e) any consultants, service providers, contractors, advisors, accountants, agents, person, representatives of the Company who provide services to or on the Company’s behalf in connection with the business of the Company (“**Third Person**”) whose Personal Data or Information may be disclosed, collected, possessed, used, processed, recorded, stored, transferred, dealt, handled and received, with respect to the business of the Company or for the purpose of receipt product/services from the Company or pursuant to your engagement/association with the Company (“**you**” or “**your**”) in India or overseas. The term “**Employees**” and “**Temporary/Contractual Resources**” is collectively referred to as the “**Constituents**”.

This Policy summarises what type of Personal Data or Information, we collect about you, purpose of collection, storage and usage of such data or information, to whom such data or information may be disclosed/transferred and how we protect your privacy.

2. TYPES OF PERSONAL DATA OR INFORMATION WE COLLECT

The term “**Personal Data or Information**” in this Policy refers to personal information which does and/or is capable of identifying you as an individual. The types of Personal Data or Information that we collect consist of personal information relating to your:

- (a) name, gender, home address, telephone number, date of birth, marital status, email address, emergency contacts or other contact information (including the gender, age, nationality and passport information of any relatives and beneficiaries); or
- (b) affiliations, interests, work history, technical skills, educational background, professional certifications and registrations, language capabilities; or
- (c) voicemails, e-mails, password, correspondence and communications; or

- (d) password; or
- (e) financial information such as bank account or credit card or debit card or other payment instrument details; or
- (f) bio-metric information, Aadhaar related information; or
- (g) physical, physiological and mental health condition; or
- (h) sexual orientation; or
- (i) any detail relating to the above clauses as provided to the Company; or any of the information received under above clauses by the Company for collecting, receiving, possessing, using, processing, recording, storing, transferring, dealing, handling and disclosing under lawful contract or otherwise.

This Policy does not apply to any information that you may disclose publicly, and which is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force and such information shall not be regarded as Personal Data or Information for the purposes of this Policy. Further, your Personal Data or Information shall not be disclosed to any Third Person unless the said Third Person is required to have your Personal Data or Information to provide required services to you and/or with your permission and/or to help investigate, prevent or take action regarding unlawful and illegal activities, suspected fraud, potential threat to the safety or security of any person, violations of the terms and conditions of use of our website or to defend against legal claims and special circumstances such as compliance with the rules of any stock exchange, subpoenas, court orders, requests/order from legal authorities or law enforcement agencies requiring such disclosure.

Further, for any Personal Data or Information disclosed by you to any service provider or trader or any third party that you connect with through our website, the Company shall not be responsible and/or liable to treat the same as the Personal Data or Information to be protected by the Company.

3. YOUR CONSENT

You are providing your consent by providing your details to the Company vide any electronic medium or through written consent form (“**Consent**”) with respect to the purpose of usage of such Personal Data or Information.

If you give your Consent, it is construed that you have done so freely and voluntarily and that you agree to this Policy. You always have the right to refuse or withdraw your Consent for the Personal Data or Information sought to be collected or withdraw your Consent given earlier to us. We will always respect such a refusal or withdrawal, but it might mean that we are unable to perform all the services, arrangements or contracts with you and will have the option to discontinue the same. We will inform you of these inabilities if they occur. However, we reserve the right to retain such Personal Data or Information as may be necessary for providing our pending services to you and in accordance with this Policy and/or if legally required, under the IT Act, IT SPDI Rules and other applicable laws.

You are aware of the -

- (a) fact that the Personal Data or Information is being collected;

- (b) contents and/or type of Personal Data or Information which is being collected;
- (c) purpose for which the Personal Data or Information is being collected;
- (d) intended recipients of the Personal Data or Information; and
- (e) name and address of the agency that is collecting the Personal Data or Information and retaining the same.

We respect your privacy, therefore, the Company will observe the following guidelines when collecting, receiving, possessing, using, processing, recording, storing, transferring, dealing, handling, retaining and disclosing the Personal Data or Information -

- (a) Personal Data or Information will be collected, received, possessed, used, processed, recorded, stored, transferred, dealt, handled, retained and disclosed in compliance with the local laws/regulations in India including IT Act and the IT SPDI Rules;
- (b) Personal Data or Information will be relevant/necessary to/for the purposes for which it is collected and used;
- (c) Personal Data or Information will be current and accurate with reasonable steps taken by the Company to rectify or delete inaccurate Personal Data or Information;
- (d) Personal Data or Information will be kept only as long as necessary for the purposes for which it was collected and processed, and as legally required under the IT Act, IT SPDI Rules and other applicable laws; and
- (e) Reasonable measures will be taken to prevent unauthorised access or use, unlawful processing, and unauthorised or accidental loss, destruction, or damage to such Personal Data or Information.

4. PURPOSES FOR COLLECTION, STORAGE AND/OR USE OF PERSONAL DATA OR INFORMATION

The primary purposes for collection, storage and/or use of Personal Data or Information is for:

- (a) the Company's business processes, operations and management for entering into or performing our obligations to you, evaluating and maintaining the quality of our services, providing support to the services you have obtained from us;
- (b) processing your order, corresponding with you, fulfilling your transaction requests and delivering the programs, information, and services requested by you or other services related inquiries;
- (c) managing client contacts, profiles, administering and providing you with information, services that you request from us or which we feel may interest you;
- (d) record keeping and other general administrative and services related processes;
- (e) ensuring the safety and protection of the rights or property of the Company or its business;
- (f) complying with applicable legal requirements in India including but not limited to governmental reporting, etc. and fulfilling statutory/legal obligations as a service provider under applicable laws, and adhering to judicial or administrative orders, compliance with laws;

- (g) contacting you via surveys to conduct research about your opinion of current services or of potential new services that may be offered by us;
- (h) monitoring or recording of certain calls, chats and other interactions relating to the online transactions which may involve you calling us or us calling you and online chats for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction;
- (i) while conducting daily business/operations such Personal Data or Information may be provided to the Company and Third Persons for the purpose of processing such Personal Data or Information for or on our behalf including but not limited to helping us perform statistical analysis, send you email or postal mail, provide clients and/or prospective clients the support/support services, arrange for deliveries of programs, information, and services, etc.;
- (j) operating our website, improving the content of our website to offer you better services and to ensure that content from our website is presented in the most effective manner for you; and
- (k) in connection with the business of the Company.

5. DATA COLLECTION DEVICES

In addition to Personal Data or Information, we may use data collection devices such as “cookies” or other technology to obtain certain types of information when your web browser accesses our website. Cookies are small files containing a string of characters to identify your browser. Cookies allow our website to remember important data or information that will make your visit to our website more useful. Our website may use cookies and other technology to store pertinent user information during a session to speed navigation and keep track of items and to collect anonymous traffic data that we may use to enhance our website and for marketing and promotional purposes. You can reset your browser to refuse cookies or warn you when they are being sent. Please note that by turning cookies off, you may not have access to all features available on our website. We also use logging systems on our internal network to register the use of our computer systems. This is done for the purpose of ensuring the performance, integrity and security of these systems. We may also contract with Third Persons to track and analyse anonymous usage and volume statistical information from our visitors and members for research purposes. Such information is shared externally only on an anonymous, aggregated basis. Such Third Persons use persistent cookies to help us to improve the visitor experience, to manage our website content, and to track visitor behaviour. All data or information collected by such Third Persons on our behalf is used solely by or on behalf of the Company and is shared externally only on an anonymous, aggregated basis.

We will make best efforts to do so but do not warrant that any of our websites or any affiliate site(s) or network system linked to our website is free of any operational errors nor do we warrant that our website will be free of any virus, computer contaminant, worm, or other harmful components. Our website contains links to other sites which are not owned or operated by the Company. The Company is not responsible and makes no guarantee for the privacy practices or the content of such websites. These links are provided only as a convenience to you. Neither is the Company, nor are any of its affiliates responsible for the availability of such Third Person’s websites or their contents. The Company will not be liable for your Personal Data or Information transmitted over networks accessed by you on these sites or otherwise connected with your use of the services. You understand, acknowledge and agree that neither the Company nor any of its affiliates are responsible or liable, directly or indirectly, for any

damage or loss of any sort caused in connection with your use of or reliance on any content of any such third party website or the services available through any such third party website.

You acknowledge that the services, content, website and/ or any software are provided on an “as is” and “as available” basis, without warranties of any kind, either express or implied, including, without limitation, implied warranties of merchantability, fitness for a particular purpose. In any case, the Company has taken adequate safeguards, and in case of any breach the Company may take action to remedy such breach. In addition to taking all the reasonable precautions as required under law, the Company expressly disclaims any and all warranties, express or implied, including, without limitation that: (i) the services and/or software will be free of all viruses and hacking; (ii) the software will work on all mobile phones, will be compatible with all mobile phone networks and/or will be available in all geographical areas; and (iii) any service will be uninterrupted, timely, secure or error-free for any reasons whatsoever including but not limited to overload/breakdown of receiving network, servers or applications; system failures out of the Company’s control or due to heavy traffic on network.

6. **DISCLOSURES OR TRANSFER OF YOUR PERSONAL DATA OR INFORMATION**

The Company will transfer, with your Consent, the Personal Data or Information to any other Third Person in India or overseas, that ensures the same level of data protection that is adhered to by the Company as set out herein for fulfilling any contractual obligation.

We will disclose or transfer your Personal Data or Information in accordance with this Policy and all applicable legal requirements in India.

Your Personal Data or Information will be disclosed or transferred, as may be required from time to time, as follows:

- (a) **For Business Purposes:** to (i) the appropriate Constituents in our offices; (ii) our affiliates and group companies; (iii) from one office within the Company to another office in India or overseas in accordance with the IT Act and IT SPDI Rules; (iv) to any third party, in the event of a proposed or actual business transfer; and (v) in connection with our business and services provided by the Company.
- (b) **To Third Persons:** working with us or on our behalf in different industries and categories of business. We will disclose, share, transfer your Personal Data or Information to any Third Person or provide your Personal Data or Information to any Third Person in connection with our business requirements or for the purposes indicated herein. Such Third Persons are required to process your Personal Data or Information they receive from us in a lawful, safe and responsible manner in accordance with this Policy and the prevailing laws and take all appropriate security and confidentiality measures such that they do not use your Personal Data or Information for their own purposes or disclose your Personal Data or Information to others. Neither the Company nor any Third Person will publish your Personal Data or Information.
- (c) **For Legal Requirement:** to any court of law and/or government agencies/entity as may be required under law and/or statutory authority, Reserve Bank of India and Credit Information Bureau India Ltd. (“**CIBIL**”) or in response to a legal process, to a lawfully authorised Government agency for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, and/or to any third party by an order under the applicable law or if we determine it is necessary or desirable to

comply with any applicable law, regulation, legal process or enforceable governmental request or to protect or defend our rights or property including compliance with accounting and tax rules and regulations or to investigate, detect, prevent, or take action regarding illegal activities, suspected fraud, security or technical issues or situations involving potential threats to the physical safety of any person.

- (d) **For Centralised Data Processing Activities:** We have centralised certain aspects of our data processing and administration in order to allow us to better manage our business. Such centralisation may result in the transfer of your Personal Data or Information: (i) from one country to another; (ii) to Constituents in other locations, etc. However, whenever your Personal Data or Information is transferred within the Company, it will be processed in accordance with the terms and conditions of this Policy.

7. REASONABLE SECURITY PRACTICES AND PROCEDURES AND AUDITS

We seek to ensure compliance with the requirements of the IT Act to ensure the protection and preservation of your privacy, therefore we take reasonable security measures to protect your Personal Data or Information against unauthorised access, alteration, disclosure or destruction. We have a number of physical, electronic, and procedural safeguards/measures in place to actively protect the confidentiality, security, and integrity of your Personal Data or Information, including a comprehensively documented information security programme and a strict security policy that contains managerial, technical, operational and physical security control measures for protecting such data or information. We have implemented ISO 27001 / ISMS standard or code of best practices for data or information protection.

We limit access to your Personal Data or Information to Constituents who we believe reasonably need to come into contact with that information for the purpose of performing their duties and rendering services to you. We have strict confidentiality obligations that apply to Constituents and Third Persons. Failure to meet these obligations may result in disciplinary and other actions, including dissolution of a contract, termination of employment and criminal prosecution.

We conduct training to authorised users regarding the lawful and intended purposes of processing your Personal Data or Information, the need to protect and keep information accurate and up-to-date and the need to maintain the confidentiality of the data or information to which such authorised users have access. Authorised users will comply with this Policy, and we will take appropriate disciplinary actions, in accordance with applicable laws in India, if your Personal Data or Information is accessed, processed, or used in any way that is inconsistent with the requirements of this Policy.

8. RETENTION OF YOUR PERSONAL DATA OR INFORMATION

We are aware of the importance of timely destruction of Personal Data or Information. We ensure that your Personal Data or Information is not stored/retained for a longer period than necessary for the purpose for which it was collected, used or processed or as provided in our contracts except when there is a legal obligation to do so under any law in India, including but not limited to, the IT Act and IT SPDI Rules. It is our practice to destroy your Personal Data or Information as soon as possible after it is no longer necessary for the purpose for which it was collected, used or processed save and except as stated hereinabove.

9. UPDATING OR REVIEWING YOUR PERSONAL DATA OR INFORMATION / QUESTIONS OR COMPLAINTS

You may by a written request review the Personal Data or Information provided by you. We will ensure that any Personal Data or Information about you which is found to be inaccurate or deficient shall be corrected or amended as may be feasible.

You expressly state that Personal Data or Information provided by you to us is correct and complete in all respects and does not contain any false, distorted, manipulated, fraudulent or misleading facts. We expressly disclaim any liability arising out of the said data or information provided by you to us. Further, you expressly agree that we are not responsible for the accuracy and authenticity of such data or information provided by you to us and you agree to indemnify the Company for all losses incurred due to our reliance upon any false, distorted, manipulated, defamatory, libellous, vulgar, obscene, fraudulent or misleading information provided by you to the Company.

In case of any discrepancies or grievances with regard to the processing of your Personal Data or Information, please contact the “**Grievance Officer**”, [*SANTOSH D. NALAWDE*]. Further on receipt of any concerns or complaints the Grievance Officer will employ all commercially reasonable efforts to address the same within 1 (one) month of receipt of same.

10. ENFORCEMENT RIGHTS

The Company will ensure that this Policy is observed. All Constituents of the Company and Third Persons who have access to Personal Data or Information are required to comply with this Policy.

All Third Persons shall only process the Personal Data or Information in accordance with the Company’s instructions or make decisions regarding such data or information as part of the delivery of their services. In either instance, the Company will select reliable Third Persons who undertake, by contract or other legally binding and permissible means, to put in place appropriate technical and organisational security measures to ensure an adequate level of protection of such data or information. The Company will require Third Persons to comply with this Policy or to guarantee the same levels of data protection that is adhered to by the Company when handling/processing such data or information. Such selected Third Persons will have access to such data or information solely for the purposes of performing the services specified in the applicable service contract and are legally and contractually bound to maintain the privacy of such data or information shared with them and will not disclose it further. If the Company concludes that a Third Person is not complying with these obligations, it will promptly take appropriate actions to remedy such non-compliance or implement necessary sanctions.

Additionally, Constituents are bound by internal confidentiality policies. Any Constituents found to have violated this Policy or any other policies will be subject to disciplinary action, up to and including termination of employment and penalties under applicable laws in India.

All Third Persons and Constituents do hereby specifically agree that they shall, at all times, comply with the requirements of the IT Act and IT SPDI Rules while collecting, receiving, possessing, using, processing, recording, storing, transferring, dealing, handling, retaining and disclosing Personal Data or Information. The said Third Persons and Constituents do further unequivocally declare that in case they violate any provisions of the IT Act and IT SPDI Rules they shall alone be responsible for all their acts, deeds and things and that they alone shall be liable for civil and criminal liability there under or under any applicable Indian law for the time being in force.

You acknowledge and accept that we have the right to terminate your access and usage rights to our website and services in the case of your non-compliance with any provision of this Policy.

11. AMENDMENT

The Company reserves the right to update, change or modify this Policy, from time to time, without prior notification. The Policy shall come into effect from the date of such update, change or modification.

We will inform you regarding any such changes by updating this Policy and will post all changes to the Policy on relevant internal and external websites. You acknowledge that such posting shall amount to information to the user as prescribed by the IT Act and IT SPDI Rules.

Effective with the implementation of this Policy, all existing intra-group agreements and the applicable privacy guidelines or practices relating to the processing of Personal Data or Information will be superseded by the terms of this Policy and stand modified accordingly. All parties to any such agreements will be notified of the effective date of implementation of the Policy. If any of the terms or definitions used in this Policy are ambiguous, the definitions established under the IT Act and IT SPDI Rules shall apply.
