

Privacy Policy

As updated on 7th July 2022

Accord Software & Systems Pvt. Ltd. (ASSPL) is strongly committed in protecting your privacy and has taken all necessary and reasonable measures to protect your information in a safe and responsible manner in accordance with the terms and conditions of privacy policy set out below.

➤ **Scope**

This privacy policy is applicable to employees of ASSPL, contractors, vendors, interns, customers, and business partners who may receive personal information, have access to personal information collected or processed, or who provide information to the organization.

➤ **Collection of Information**

- In general, all such information provided from your side to us, which may include name, phone number, address etc.
- Personal and non-personal information that we collect about you from third parties like business partner, contractors, vendors etc.

➤ **Purpose of collecting and processing personal information**

Personal information shall not be collected by ASSPL unless either of the following is fulfilled:

- processing is necessary for the performance of a contract to which the data subject is a party.
- processing is necessary for compliance with the organization's legal obligation.
- processing is necessary in order to protect the vital interests of the data subject.
- Processing is necessary for the performance of a task carried out in the public interest.
- For background verification purposes.
- Operational issues such as promotions, disciplinary activities, grievance procedure handling.
- Audits, investigations, analysis and statistics, for example of various recruitment and employee retention programs.
- IT, Security, Cyber security and Access Controls.

ASSPL only collects, uses and processes Personal information for purposes that are reasonable and legitimate. Such personal information shall be processed in a manner compatible with the agreed purposes, unless the data subjects have consented to it being processed for a different purpose or the use for a different purpose is permitted by applicable law.

➤ **Disclosure**

In the event ASSPL decides to disclose the personal information of the data subjects to a third party, it shall inform the data subject either by way of privacy notice or through contract

agreement the purpose and need for such disclosure. Personal information of data subject may be disclosed to a third party only for the reasons consistent with the purposes mentioned above and ensure that the consent of the data subject has be duly received. Moreover, ASSPL shall ensure that the third party sign an NDA (non-disclosure agreement) before sharing the personal information of the data subject with the third party.

➤ **Data subject rights**

ASSPL shall establish a mechanism to enable and facilitate exercise of data subject's rights of access, blockage, erasure, opposition, rectification, and, where appropriate or required by applicable law. The data subject shall be entitled to make the above the request to obtain details about their personal information and ASSPL shall provide its response within 72 hours of receipt of such written request.

➤ **Retention**

ASSPL shall not retain the personal information of data subject for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force.

➤ **Security**

ASSPL shall take reasonable security measures to protect Personal Data against loss, misuse, unauthorized or accidental access, disclosure, alteration and destruction. ASSPL shall implement policies and maintains appropriate technical, physical, and organizational measures and follow industry practices and standards in adopting procedures and implementing systems designed for securing and protecting Personal Data

➤ **Grievance Officer**

Any questions, discrepancies, and grievances of data subject with respect to collection and processing of Personal Data may be made to the Grievance Officer at sudhirns@accord-soft.com. The Grievance Officer shall redress the grievances of the data subject expeditiously and in any event within the period prescribed under law.

➤ **Changes to Privacy Policy**

We reserve the right to modify this, Policy. If we decide to change our Privacy Policy, such changes will be posted on our official website or on our office premises so that you are always aware of the latest amendments in this Privacy Policy.