



# DATA PROTECTION POLICY

Document Release Date: 10 April 2018  
Document Version: 1.0  
Document classification: External / Important

**Document Control:**

<b>Document Status</b>	Draft
<b>Document Classification</b>	External / Important
<b>Document Owner</b>	Director – Information Technology – CITS
<b>Document Location</b>	<a href="http://www.onmobile.com">www.onmobile.com</a>
<b>Effective Date</b>	10 April 2018
<b>Version</b>	1.0

**Approval and authorization:**

<b>Name</b>	<b>Designation &amp; Department</b>	<b>Date</b>
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## 1. Terms and Terminologies

**1.1 “Biometrics”** means the technologies that measure and analyze human body characteristics, such as 'fingerprints', 'eye retinas and irises', 'voice patterns', 'facial patterns', 'hand measurements' and 'DNA' for authentication purposes;

**1.2 “Grievance Officer”** OnMobile's designated ‘Grievance Officer’.

**1.3 “OnMobile”** OnMobile Global Limited and its permitted affiliates, successors, group companies, branches, subsidiaries and assigns.

**1.4 “Personal Information”** shall mean, any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate and is capable of distinguishing or tracing an individual's identity, such as name, social security number, Mobile Station International Subscriber Directory Number (MSISDN), date and place of birth, biometric records and any other information that is linked or linkable to an individual, such as medical, educational, financial and employment information.

### 1.5 Reasonable Security Practices and Procedures

**1.5.1** A body corporate or a person on its behalf shall be considered to have complied with reasonable security practices and procedures, if they have implemented such security practices and standards and have a comprehensive documented information security programme and information security policies that contain managerial, technical, operational and physical security control measures that are commensurate with the information assets being protected with the nature of business. In the event of an information security breach, the body corporate or a person on its behalf shall be required to demonstrate, as and when called upon to do so by the agency mandated under the law, that they have implemented security control measures as per their documented information security programme and information security policies.

**1.5.2** The international Standard IS/ISO/IEC 27001 is one such standard referred to in 1.5.1.

## 2. Purpose and Scope

- 2.1. The purpose of Data Protection Policy (“this Policy”) is to set out the process and the framework within which OnMobile can collect, use and protect Personal Data of Individuals. The Policy states how OnMobile collects, uses, processes and safeguards the Personal Data that it possesses, holds, and deals with respect to Individuals.
- 2.2. This Policy applies to all Individuals including but not limited to employees, consultants, managers, officers, directors, employees (whether permanent, fixed term or temporary), contractors, volunteers, interns, home workers, part-time workers and agency workers of OnMobile.

## 3. Compliance with Privacy and Data Protection requirements:

- 3.1. **Collection, Use and Processing of Personal Data:** OnMobile would use Individual’s Personal Data for lawful purpose and only in connection with employment or the provision of services to OnMobile, and it will ensure that such use is fair and lawful.

OnMobile while collecting Personal Data of Individuals shall:

- Ensure that it will only collect and use such Personal Data as is necessary for the purpose for which it is collected and not collect Personal Data more than is required;
  - Ensure that Personal Data is updated in the company records, as provided by Individuals; and
  - Ensure that it does not hold Personal Data for longer than is necessary, taking into account its purpose, any legal or regulatory obligations to retain the Personal Data or as per the requirements of OnMobile's Document Retention Policy.
- 3.2. **Security:** OnMobile shall adopt Reasonable Security Practices and Procedures, to protect Personal Data from accidental loss, theft, destruction, damage, unauthorized or unlawful processing.
  - 3.3. **Use of Individual’s Personal Data by OnMobile:** OnMobile may itself or through a third party, service provider process Personal Data of Individuals and disclose such Personal Data to third parties, for a variety of business purposes including, without limitation, the following:
    - performing its obligations in connection with Individual’s employment with (or engagement by) OnMobile including in relation to recruitment, the provision and

checking of references, personnel performance management, review and professional development, payroll, fund management and accounting (including for the payment and review of salaries and other benefits), pensions administration, and insurance administration;

- managing and operating OnMobile's businesses, technology infrastructure, support and facilities (including in relation to the operation and monitoring of OnMobile systems and facilities) and managing OnMobile's property;
- advertising, marketing and developing the business of OnMobile and promoting public relations in relation to the same;
- administering relationships with customers and suppliers;
- preventing and detecting breaches of law, and apprehending and prosecuting offenders (including through the use of CCTV);
- complying with law, regulation, guidance or rules, demands or requests made by local and foreign regulators, governments and law enforcement authorities, including tax collection agencies and stock exchanges (whether or not having the force of law) or any court order or court process, or in connection with any litigation (including any discovery or disclosure process in connection with litigation);
- in connection with any sale, merger, acquisition, disposal, reorganization or similar change of OnMobile's business or assets, including any due diligence or similar process carried out in connection with such a transaction; and
- Any other purpose that is incidental to or connected with the foregoing purposes or otherwise in the course of OnMobile's legitimate business.

#### **4. Data Transfer to Third Party**

OnMobile or any other person on its behalf may transfer Personal Data to any other body corporate or a person located in any other country that ensures the same level of Data Protection that is adhered to by OnMobile. The transfer may be allowed only if it is necessary for the performance of the lawful contract between OnMobile or any person on its behalf and provider of information or where such person has consented to data transfer.

#### **5. Rights of Individuals and access to information**

OnMobile will maintain accurate and up to date Personal Data as provided by Individuals however, it shall not be responsible for authenticity of Personal Data provided by such Individuals to OnMobile or any other person acting on behalf of OnMobile.

Individuals will have a right to request a copy of their Personal Data held by OnMobile and must regularly review and update their Personal Data that OnMobile holds in order to ensure that the Personal Data is correct and accurate. Individuals may request

OnMobile to cease use of their Personal Data, and in such situation, such Individuals may contact the Grievance Officer.

## **6. Grievance Officer**

The details of the Grievance Officer are as follows:

Name: Manu Sharma

Designation: Director – Information Technology – CITS, India

Email:privacy@onmobile.com

Telephone: 080-4180-2506

The Grievance Officer shall ensure implementation of this Policy, and shall make the Policy available to Individuals and redress the grievances of the provider of Personal Data expeditiously within one month from the date of receipt of grievance(s). The Grievance Officer in consultation with OnMobile management will update the Policy as required from time to time.