



# Data Privacy Policy

## 1. Summary

Shraddha Utilities Pvt. Ltd. (SUPL) is committed to safeguarding the confidentiality, integrity, and availability of personal data it collects and processes during its operations as a leading electrical service provider. This policy outlines SUPL's approach to handling personal data in compliance with applicable laws, ethical standards, and information security principles.

## 2. Purpose

The purpose of this policy is to define how SUPL collects, processes, stores, protects, and shares personal data of its employees, customers, contractors, and stakeholders. It ensures compliance with the **Digital Personal Data Protection Act (DPDP Act), 2023**, and promotes transparency and accountability.

## 3. Scope

This policy applies to:

- All employees (current and former)
- Contract staff
- Vendors, partners, and customers who share personal data with SUPL
- Data processed digitally or in physical form during business operations

## 4. Policy Guidelines

### 4.1. Type of Personal Data Collected

SUPL may collect the following categories:

- Name, address, contact number, email
- Date of birth, gender, photograph
- Identification (PAN, Aadhar, etc.)
- Employment-related information (experience, qualifications)
- Banking and payment details
- Emergency contacts
- Location (where required for operational tracking)

**Sensitive Personal Data** (processed only under legal and secure conditions):

- Health status (for safety assessments)

- Criminal records (only for certain job roles)
- Biometric data (if used for access control)

## **4.2. Purpose for Collection**

SUPL collects personal data for:

- Recruitment and onboarding
- Contract execution and payroll
- Compliance with statutory/legal obligations
- Project operations and resource management
- Security, health, and safety monitoring
- Internal communication and grievance handling

## **4.3. Use and Processing of Personal Data**

SUPL processes data:

- With the consent of the individual
- Under legal obligation
- For contractual necessity
- Under legitimate business interest, with safeguards for individual rights

## **4.4. Data Sharing**

SUPL may share personal data:

- With auditors, legal advisors, or statutory authorities
  - With clients or partners (as required for project execution)
  - With third-party processors under binding confidentiality agreements
- SUPL ensures third parties meet adequate data protection standards.

## **4.5. Data Retention and Deletion**

Personal data will be retained:

- For as long as necessary to fulfill the intended purpose
- In compliance with legal retention mandates
- Securely deleted or anonymized after expiration

## **4.6. Data Security**

SUPL follows industry-standard cybersecurity practices, including:

- Password protection and access controls
- Antivirus and endpoint protection
- Encrypted storage and communication
- Secure backups and disaster recovery
- Awareness training for employees

## 4.7. Rights of Data Subjects

Data subjects may:

- Request access to their personal data
- Request correction or deletion
- Withdraw consent (where applicable)
- Lodge complaints regarding misuse or breach

SUPL will respond to all requests in accordance with applicable laws and within statutory timeframes.

## 5. Data Breach Protocol

In the event of a data breach:

- Immediate containment and investigation will be conducted
- Affected individuals and authorities will be informed if required
- Lessons learned will be integrated into future preventive practices

## 6. Governance

The Data Protection Officer (DPO) will:

- Monitor compliance
- Manage data privacy risks
- Conduct impact assessments
- Train employees on privacy awareness

Senior management is accountable for enforcing and reviewing this policy annually.

## 7. Complaints and Redressal

Data privacy complaints must be reported to the DPO at:

 [supl@shraddhagroups.com](mailto:supl@shraddhagroups.com)

An impartial investigation will be carried out, and appropriate action will be taken within a reasonable time.

## 8. Enforcement and Disciplinary Action

Non-compliance with this policy may result in:

- Disciplinary measures
- Termination of services/contracts
- Legal liability, if applicable

SUPL promotes a speak-up culture with zero retaliation for whistleblowers.

## 9. Review and Update

This policy will be:

- Reviewed annually
- Updated based on regulatory changes, operational needs, and emerging risks