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Sona BLW Precision Forgings Limited ("Sona Comstar") is committed to safeguarding the privacy and confidentiality of any information entrusted to its care. Sona Comstar is dedicated to upholding this fundamental responsibility by ensuring the proper safeguarding and utilization of Personal Identifiable Information (PII), also known as "**Personal Data**" or "**Personally Identifiable Information**", gathered by us.

This document describes how we use and process your Personal Data, provided in a readable and transparent manner. It also tells you what rights you can exercise in relation to your Personal Data and how you can contact us.

How do we gather Personal Data?

Directly: Personal Data is acquired from individuals through various means, such as when they visit our offices, complete our online forms, or provide Information for recruitment purposes. Additionally, we may acquire Personal Data in a direct manner when we establish a business relationship, perform professional services pursuant to a contract, or utilize our hosted software applications, among other instances.

Indirectly: Personal Data pertaining to individuals is acquired by us through a diverse range of channels, including recruitment services and our clients:

- Business clients: While engaging us to provide professional services, our business clients may be required to disclose Personal Data that they have authority over. For instance, payroll data will be examined during an audit, and Personal Data is frequently required to deliver social security benefits and global mobility services. Personal Data under the control of our clients may also be processed through our hosted software applications, which are subject to varying privacy terms, policies, and notices.
- Recruitment services may involve the acquisition of Personal Data pertaining to candidates from sources such as former employer and employment agencies.

Which types of Personal Data are gathered?

- The subsequent categories of Personally Data may be acquired by us via direct interactions with individuals, information obtained from client engagements, applicants, suppliers, and other circumstances as detailed in this Privacy Notice;
- The subsequent enumeration comprises the types of Personal Data that we routinely gather while conducting business;
- Contact information, including but not limited to the following: name, organization name, professional and personal email addresses, and postal and mobile phone numbers;
- Professional information (including employment and career background, academic credentials, professional affiliations);
- Cameras may capture images of visitors at our locations;
- Sensitive Personal Data: Apart from our own Employees, we do not generally gather sensitive or special categories of Personal Data. Sona Comstar may be required to process the Sensitive Personal Data of our Employees and would only process such data when required to do so for the purpose of protecting interest of individuals, establishing, or defending legal claims, exercising its rights and obligations as an employer (including for occupational health purposes), or with the explicit consent of the individual or individuals involved.

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The following are instances of Sensitive Personal Information that we might acquire or retain:

1. Personal identification documents that have the potential to disclose information such as religion and biometric data of Employees;
2. Data furnished by our consumers during the progression of our professional collaboration;
3. Applicants voluntarily disclose diversity and equal opportunity information during the recruitment process;
4. To ensure a secure environment for our Employees, Health Data may be processed as required.

Childrens Data:

1. Sona Comstar does not purposefully target or cater to individuals who are younger than 18 years old through its website;
2. Sona Comstar collects and gather information from individuals under the age of 18 from their Employees and Directors occasionally for legal and statutory compliance purposes and the said collection of Children's Data is subject to their parental or guardian consent.

On what legal basis do we engage in the processing of your Personal Data?

When we collect and use Personal Data to operate our business and provide our products and services, we may do so for the following lawful reasons:

- Personal Data Processing: For fulfilling our contractual responsibilities to the pertinent individuals or entering in a contract with them, we may process their Personal Data.
- Consent: Your voluntary consent at the time you provided us with your Personal Information may be relied upon. At any moment, you have the option to withdraw or modify your consent by sending an email.
- Legitimate interests: Based on our assessment that the processing is equitable, rational, and impartial, we may rely on legitimate interests.

We may collect Personal Data for the below instances, but it is not limited to:

- Protect and prevent fraudulent or illicit activity by monitoring our IT systems.
- Corporate social responsibility and corporate responsibility obligations must be adhered to.
- Personal Data may be processed to comply with our legal and regulatory mandates and obligations.
- Public Interest – In the exercise of official authority vested in us or to carry out a specific task in the public interest, we may process Personal Data.
- Vital Interests – In order to safeguard the essential interests of the individual or another natural person, we may process their Personal Data.

What is the purpose of collecting Personal Data?

Our goal is to be transparent in our collection and use of Personal Data, and we will explain why we require it. This typically entails the following:

- Providing expert guidance. Our services may encompass the evaluation of client files to ensure quality, which may necessitate the processing of the pertinent client's Personal Data.
- Engaging in the promotion of our products, services, and capabilities to prospective and current business clients.
- Performing the duties of administration, maintenance, and security assurance for our information systems, applications, and websites.



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- Adhering to legal and regulatory requirements pertaining to the SEBI (Prohibition of Insider Trading) Regulation, 2015, prevention of money laundering, financing of terrorism, fraud, and other financial offenses.
- Assembling health and safety data (either directly or indirectly) in the aftermath of an accident or incident. CCTV footage, incident reports, first aid reports, and witness statements are all examples of indirect data.
- To assess, monitor, and control the spread of infectious diseases and to ensure the safety of our Employees, we collect Health Data.

Are personal details disclosed to Third Parties?

- On occasion, we may disclose Personal Data and it may be accessible to authorized Internal recipients within Sona Comstar, its subsidiaries or our authorized service providers including cloud service providers who provide services to Sona Comstar, tax consultants and authorities, Government Bodies including statutory, regulatory authorities, law-enforcement agencies (where applicable), Auditors (internal/external), depositories, Registrar & Transfer Agents, stock exchanges.
- Consequently, on occasion, Customers, Vendors, Suppliers Information might be transferred to said other organization and the concerned Information will always be safeguarded by the organization, irrespective of its location of use or transfer.
- In addition, the organization may divulge affiliate information in situations where such disclosure is required to adhere to a legal or statutory duty.

Are your Personal Data transferred outside of India?

Personal Data may be transferred to our subsidiaries located outside of India namely USA, China, Serbia, and Mexico only if there is a legitimate business purpose for us to involve those entities. It is the responsibility of Sona Comstar to ensure the preservation of Personal Data in adherence to relevant data protection legislation and contractual obligations.

How do we implement cookies?

Sona Comstar and its wholly owned subsidiaries uses both first- party and third-party cookies on our website.

For more information on our Cookie Policy please refer to this link [Cookie Policy](#)

Which data protection privileges do you possess?

FOR European Union Residents:

GDPR confers upon individuals the Right to:

- Access – You may request clarification on whether we are processing your Personal Data, if so, request that we verify that we are doing so.
- If you believe that our records contain inaccurate or insufficient information about you, you may request that we make the necessary corrections.



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- You may request that we erase (delete) your Personal Data at any time, including when you withdraw your consent to processing or when it is no longer required for the original purpose for which it was collected.
- You have the right to object to our utilization of your Personal Data for the purpose of direct marketing, which includes profiling. We might be required to retain a minimal amount of information to honour your request to cease receiving marketing communications.
- The right to rescind consent pertains to the ability to revoke prior consent granted for the processing of Personal Data for one or more specified purposes. The lawfulness of any processing conducted prior to your withdrawal of assent will remain unaffected. It may mean that we are unable to provide you with products or services; if this is the case, we will notify you.

For Indian Residents:

DPDP Act confers upon individuals the below rights as well:

- Right to erasure of Personal Data.
- Right to seek information as to all the Data Fiduciaries with whom Personal Data has been shared, along with the categories of Personal Data shared, in one place.
- Right to redressal of grievance from the Data Fiduciary at the first instance and then approach the Board.
- Right to nominate another individual who will exercise the Data Principal's rights in case the event of the Data Principal's death or incapacity.
- By employing this procedure, we can assure that no unauthorized individual is granted access to Personal Data.
- Requests do not incur any associated fees unless they are manifestly unfounded or excessive in nature.
- There may be additional lawful grounds upon which we are unable to grant your request, contingent upon the specific circumstances.

What about the security of Personal Data?

We have implemented the necessary organizational and technical security policies and procedures to safeguard Personal Data (including Sensitive Personal Information) against loss, misuse, modification, or destruction. Our objective is to restrict access to your Personal Data solely to individuals who require it. It is the responsibility of those individuals who are granted access to the data to uphold the confidentiality of said information. In an endeavour to enhance the security of Personal Data, pseudonymization, de-identification, and anonymization techniques may be implemented.

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For how long do we keep Personal Data?

We maintain Personal Data to maintain communication with Data Subjects/Principals, provide our services, and adhere to relevant laws, regulations, and professional responsibilities to which we are obligated to. Unless a different retention period is mandated by specific legal, regulatory, or contractual obligations or business necessity, Personal Data that we retain for the purposes is retained in accordance with the Data Retention Policy of Sona Comstar.

Who can be contacted with inquiries or concerns regarding this Privacy Notice?

Please submit any inquiries or remarks regarding this Privacy Notice, exercising your Privacy Rights, or for withdrawal of your consent to the Data Protection Officer (“DPO”) at dpo@sonacomstar.com

We strive to provide responses no later than 30 days after receiving communications pertaining to privacy.

Adopted on	14 th March, 2024
Signed by	