

In accordance with Rule 4 of Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 under the Information Technology Act, 2000

INSILCO LIMITED

CONTENTS

1.0	OBJECTIVE.....	3
2.0	SCOPE	3
3.0	DEFINITIONS.....	3
4.0	POLICY DETAILS	4
5.0	DOCUMENT HISTORY	6

1. Objective

The purpose of the Policy is to set out the duties of the Company i.e. Insilco Ltd. and its personnel when they are processing personal data about individuals and describe the rights of the individuals whose personnel data is processed by the company.

The purpose of the Privacy policy is to balance the government's need to maintain information about individuals with the rights of individuals to be protected against unwarranted invasions of their privacy stemming from federal agencies' collection, maintenance, use, and disclosure of personal information about them.

2. Scope

- The Policy is applicable on
- All the employees working within Insilco Ltd.
- Any person who in its due course provides any information to the Company such as visitors, contract workers, supplier contracts, website users, and shareholder etc.
- The policy lays down the manner in which company collects, uses, holds, transfer and processes the sensitive information provided.

Effective Date

This policy will be effective from 2nd May, 2016.

3. Definition

“Company means Insilco Ltd.”.

“Personal information” means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available with the company.

“Sensitive personal data or information” of a person means such personal information which consists of information relating to:

- i. Bank Account information and other financial information such as credit card or debit card or other payment instrument details ;
- ii. Income tax returns
- iii. password;
- iv. physical, physiological and mental health condition;
- v. sexual orientation;
- vi. medical records and history;
- vii. Biometric information;

- viii. any detail relating to the above clauses as provided to body corporate for providing service; and
- ix. any of the information received under above clauses by the company for processing, stored or processed under lawful contract or otherwise provided that, any information that 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 shall not be regarded as sensitive personal data or information for the purposes of these rules.

4. Policy Details

Insilco Ltd. is committed to protect your personal information including sensitive personal data or information. We have created this Privacy Policy to help you understand how we handle and deal with the above referred information.

1. Types of data collected and purpose of collection

We collect your bank account information which comes under the definition of sensitive personal data or information and is classified under financial information. The bank account information is collected for the purpose of timely disbursement and remittance of your salary. We also collect and retain your income tax saving proofs which may be necessary for computation and deduction of taxes. Any other information obtained such as past employment details - salary slip, appointment letter and other personal information that we collect from you is held in accordance with applicable laws and regulations in India.

2. Disclosure and transfer of Personal Information including Sensitive personal Data or Information

We may disclose your personal information including sensitive personal data or information to third parties for processing of such information and for other lawful purposes including providing benefits to employees such as mediclaim and other insurance benefits etc.. We may also transfer your sensitive personal data in case of bankruptcy, merger and or in the event of sale.

We may share your personal information including sensitive personal data or information, with government agencies mandated under law to obtain personal information including sensitive personal data or information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, or where disclosure is necessary for compliance of a legal obligation. Also any personal information including sensitive personal data or information may be required to be disclosed to any third party by us by an order under the law for the time being in force.

Transfer of information- The Company may transfer sensitive personal data to any other Evonik Group Company which is required for official purposes. The Company will not transfer sensitive personal data or information to any other party which are not allowed under Indian law.

3. Reasonable security practices and procedures: Protection of your personal information including sensitive personal data or information

We shall take reasonable steps to ensure that the personal information including sensitive personal data or information pertaining to you is stored in a secure environment protected from unauthorized access, modification or disclosure.

- We maintain personal information including sensitive personal data or information pertaining to you in our business records as per current regulatory requirements.
- We have in place comprehensive documented information security policy and procedure to ensure that the information provided by you is reasonably secure.
- We shall retain your personal Information including sensitive personal data or information till the subsistence of your employment with Insilco Ltd. or otherwise required under law or for longer period for the record of the company.

In case of any privacy related concerns, feedback or grievance, you can contact: Mr. Anurag Srivastava, who is the Grievance Officer and can be contacted on email id and contact information.

Security of IT Facilities:-

i. Access to the IT facilities

Access to IT facilities is controlled by password and is governed by IT password policy of Evonik. Information has been classified as confidential/public and accordingly the access has been granted.

ii. Security of Computers, servers and network

Company has taken necessary safeguards for physical safety of all its IT components. The access to computers, servers is restricted through passwords. Evonik manages the security of network for all its group companies worldwide. It has taken all the necessary safeguards like Firewalls, proxy servers, remote access through VPN to control & safeguard the network from outside & necessary policies are in place.

4. Review and updating of Personal Information including sensitive personal data or information

We strive to keep our records updated with your latest information. To this end, if you see any discrepancy in your personal information including sensitive personal data or information or if a part of your personal information including sensitive personal data or information changes, we request you to get in touch with Mr. Anurag Srivastava, head of Human Resource Department or write to him at his email id.

5. Changes to our Privacy Policy

We reserve the right to update this Policy as necessary from time to time. Updated copy or the same shall be available with HR department for reference of employees.

5.0 Document History**5.1 Policy reviewed by**

Name	Title	Signature	Date
Manoj Kumar	Sr. Manager IT	Sd/-	02/05/2016
Anurag Srivastava	Sr. Manager (HR & Admin.)	Sd/-	02/05/2016

5.2 Policy authorised by

Name	Title	Signature	Date
Brijesh Arora	Joint Managing Director	Sd/-	02/05/2016