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**1. SCOPE**

All employees, customers, vendors, suppliers, and business partners interacting with Glochem.  
All personal and sensitive personal data collected, stored, processed, or shared by Glochem.  
The purpose of this policy, which is to ensure compliance with IT Rules, 2011 for the protection of sensitive data and information (SPDI) within Glochem industries private limited, Bollaram facility.

**2. RESPONSIBILITY**

Grievance Officer	HR Department
Self-reporting of infectious diseases	All Employees

**3. APPROACH / PRINCIPLE**

Outline the types of personal information we collect.  
Explain how we use and protect this information.  
Ensure compliance with the IT Rules, 2011, and other applicable data protection laws in India.

**4. PROCEDURE**

**4.1. INFORMATION WE COLLECT**

4.1.1. Glochem will collect the following types of information at the time of employee joining.

- Name
- Contact details (phone number, email address, residential address)
- Date of birth
- Gender
- KYC (AADHAR, PAN, PASSPORT, etc..)

**4.2. SENSITIVE PERSONAL DATA OR INFORMATION (SPDI)**

- 4.2.1. Financial information (e.g., bank account details, credit card numbers)
- 4.2.2. Health information (e.g., medical records, health status)
- 4.2.3. Passwords.
- 4.2.4. Biometric information.
- 4.2.5. Any other data classified as SPDI under applicable laws

**4.3. HOW WE COLLECT INFORMATION**

- 4.3.1. Direct interactions (e.g., job applications, onboarding forms, feedback forms).
- 4.3.2. Automated systems (e.g., website cookies, IT systems).
- 4.3.3. Third-party vendors or service providers authorized to share such information.

**4.4. USE OF INFORMATION**

- 4.4.1. To provide services and support.
- 4.4.2. To process transactions and payments.
- 4.4.3. To comply with legal and regulatory obligations.
- 4.4.4. For internal record-keeping and audits
- 4.4.5. To enhance user experience through feedback and improvements.

Sign & Date	Prepared By <i>[Signature]</i> 09.01.2025	Reviewed By <i>[Signature]</i> 09.01.2025	Approved By <i>[Signature]</i> 09.01.2025
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4.5. SECURITY PRACTICES

- 4.5.1. Glochem has implemented reasonable security practices and procedures to protect personal data, including:
  - 4.5.2. Encryption of sensitive data during transmission.
  - 4.5.3. Secure storage mechanisms with restricted access and ensure that sensitive data is securely deleted and destroyed once it is no longer needed.
  - 4.5.4. Regular audits and penetration testing
  - 4.5.5. Employee training on data protection and privacy.

4.6. RIGHTS OF INDIVIDUAL

- 4.6.1. As per the IT Rules, 2011, individuals have the right to:
  - 4.6.2. Access and review their personal data held by Glochem.
  - 4.6.3. Request corrections or updates to inaccurate or incomplete data.
  - 4.6.4. Withdraw consent for the collection and processing of data (subject to legal obligations).
  - 4.6.5. Seek the deletion of their data where applicable.
  - 4.6.6. Requests can be submitted to the Data Protection Officer (HR Manager)

4.7. DATA RETENTION

- 4.7.1. We retain personal data only as long as necessary to fulfil the purposes outlined in this policy or as required under applicable laws.

4.8. GRIEVANCE REDRESSAL

- 4.8.1. Individuals can raise concerns or grievances related to data privacy by contacting.
- 4.8.2. **Grievance Officer:** J V MAHENDRA NATH  
**Email:** mahendranath.jetti@glochemindia.com  
**Contact:** 8790531344
- 4.8.3. As per the IT Rules, grievances will be addressed within 30 days of receipt.

4.9. POLICY REVIEW

- 4.9.1. This policy is subject to periodic reviews and may be updated to reflect changes in legal or regulatory requirements. Updates will be notified through our official website.

5.0 SCHEDULES

- 5.1 Not Applicable

6.0 REFERENCES

- 6.1 IT Rules, 2011, and other applicable data protection laws in India.

7.0 ORIGINATING / EFFECTIVE LOCATION

- 7.1 Glochem Industries Pvt Ltd, Unit-1, Bollaram.

8.0 FORMATS

- 8.1 Not Applicable

Sign & Date	Prepared By <i>Raj</i> 09.01.2025	Reviewed By <i>Keath</i> 09.01.2025	Approved By <i>09.01.2025</i>
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9.0 REVISION HISTORY

Revision No	Change description	Effective date
00	A new Privacy policy was incorporated. Refer CCF No: CCF/01/GEN/24/165.	

10.0 ABBREVIATIONS

Abbreviation	Description
SOP	Standard Operating Procedure
Ver. No	Version Number
Doc.	Document
FMT	Format
SPDI	Sensitive Personal Data or Information
HR	Human Resources

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