

All our policies are available on the ESGDS Intranet for our internal employees



# ESGDS Data Privacy & Protection Policy

## Contents

1. Purpose .....	3
2. Scope.....	3
3. Data Protection / Security.....	3
4. Collection and Storage of Personal Information.....	3
5. Use of Human Resources Data.....	4
6. Website Visitors' Data.....	4
7. Data Sharing with Third Parties .....	5
8. Use, Retention and Disposal .....	5
9. Roles & Responsibilities .....	6
10. Compliance Review.....	6

## 1. Purpose

The purpose of this policy is to detail the Organization's approach towards Data Privacy and Protection. This policy is applicable to employees, contractors, vendors, interns, associates, customers and business partners of ESGDS.

## 2. Scope

This policy is applicable to all ESGDS employees, contractors, vendors, interns, associates, customers, and business partners who may share / receive / have access to personal information.

All the Stakeholders are expected to read this policy and be aware of the scope, their roles, and responsibilities with respect to Data Privacy and Protection.

This Policy would be made available on Intranet and Corporate Website.

## 3. Data Protection / Security

Data must be treated as confidential and must be secured with suitable measures to prevent unauthorized access and illegal processing or any kind of misuse.

Individuals noticing any kind of data breach can bring this to the attention of the organization by emailing to [privacy@esgds.io](mailto:privacy@esgds.io). Upon receiving any such information, the CEO & the CTO will analyze the incident and act upon it on high priority.

## 4. Collection and Storage of Personal Information

ESGDS does not collect any information automatically. All the information received from Individuals or Business entities are shared by them during business transaction or during employment.

ESGDS shall take steps to ensure that personal information in its records is accurate and relevant to the purposes for which it was collected.

On the website, ESGDS may use third-party cookies. User consent is sought to browse the site and for placing cookies. As ESGDS does not collect any personal information through its website, the storage of the Website data is not be restricted to specific Geographies.

ESGDS does not authorize any third parties to collect personal information on its behalf. In case any third parties are subsequently authorized to collect personal information on the behalf of ESGDS, we will ensure that the vendors comply with the privacy requirements of ESGDS as defined in this policy.

## 5. Use of Human Resources Data

ESGDS is always looking for new employees, and we are always pleased to receive solicited/un-solicited job applications. If any candidate wishes to apply for a position with us, we encourage such candidates to apply directly through our website.

When we receive an application for employment with ESGDS, we process personal data as below:

1. Personal data will be treated confidentially
2. We only use your personal data for recruitment purposes
3. We do not disclose your personal data, except for the data processors we use in our recruitment procedure.
4. ESGDS has made the Privacy policy available on its Corporate Website. Candidates are encouraged to read the same before transmitting their personal data to ESGDS for considering their candidature. Access to this personal data is restricted to relevant employees within ESGDS only.

ESGDS stores employee details and performance data with security-cleared data processors, who are assisting us with HR services. Your personal data are stored on secure servers.

## 6. Website Visitors' Data

In general, website visitors do not need to provide personalized information to ESGDS. We do collect "aggregate data," that is, group data with no personal identifiers. We may use this aggregate data to help us understand how the site is being used and to improve its usability. We also use it to enhance the quality and availability of products and services we offer.

When you send an inquiry to us through our contact form, we use the personal data that you have stated in the contact form to contact you. Any personal data received from you will not be used for any other purpose without your prior consent and knowledge and will not be disclosed. If personal data is provided, and retained, it is only name, business contact email, and business contact phone number, which allow ESGDS to contact the visitor at his or her organization. ESGDS solely holds the information and engages in no contact-sharing program with other organizations.

In compliance with the EU Privacy Directive, ESGDS websites ask permission of the visitor prior to setting Cookies. Should the visitor agree, ESGDS server will only collect the following information:

1. The visitor's IP address (including the domain name associated with the IP address, i.e. using reverse look-up).
2. The date and time of the visit to the website.
3. The pages visited on the website.
4. The browser being used.

In addition, where this is available, ESGDS may also collect:

1. The country from which the visitor is accessing the website.
2. The language of the browser being used.
3. The website from which the visitor is accessing the ESGDS website.
4. The search word used (if the site is accessed via a search engine).
5. The type of connection and operating system.

We only use this data to improve the visitor's website experience. We rely on consent given as the lawful basis under GDPR Article 6(1)(a).

## 7. Data Sharing with Third Parties

ESGDS will not share PII data except Human Resources data with Third Parties and if there is a business necessity, sharing of personal data will be done only after obtaining consent of the relevant party.

The third party is required to use the data only for the defined purposes and must agree to maintain a data protection level equivalent to this Data Protection Policy.

In some cases, like any legal obligation, law enforcement agencies etc, ESGDS is allowed to share the personal data with third parties without the consent of the relevant person.

Some of the data collected through Website Cookies might be shared with Third Parties. Details of the Third Parties and the purpose of the Cookies are available on the Website and the Users will need to provide explicit consent on what can be shared

## 8. Use, Retention and Disposal

ESGDS shall share this Policy through Intranet and Corporate Website with all concerned parties with details on how it collects, uses, retains, and discloses personal information about them.

Personal information shall be collected only for the purposes identified in the SoW / contract agreements.

Personal information/data shall be retained for a period no longer than is necessary for the purposes for which they are obtained and processed and shall be disposed once it has served its intended purpose or as specified by the data subject.

## 9. Roles & Responsibilities

<p><b>Individuals</b> <b>(Employees, contractors, vendors, interns, associates etc.)</b></p>	<ul style="list-style-type: none"> <li>• Store any personal information about Self/Customers in a secure way</li> <li>• Do not share any personal information with anyone unless they are authorized</li> <li>• Inform “Data Privacy Officer” in case any violation of this policy is observed</li> </ul>
<p><b>Business Entities</b> <b>(Customers, Partners etc.)</b></p>	<ul style="list-style-type: none"> <li>• Share and discuss Data Privacy and Protection requirements upfront at the time of contract drafting. Include the following as a part of SoW:             <ul style="list-style-type: none"> <li>○ Regulatory requirements (like GDPR, CCPA)</li> <li>○ Geographical storage restrictions</li> <li>○ Data storage requirements (like encryption)</li> <li>○ Data retention duration</li> <li>○ Data destruction process</li> <li>○ Audit/Review process</li> </ul> </li> <li>• Share limited data. Redact / anonymize wherever possible if they are not relevant to the scope of work performed by ESGDS</li> <li>• Share data with authorized members only</li> <li>• When sharing sensitive PII, explicitly mention about the sensitivity</li> </ul>
<p><b>ESGDS Technology Team</b></p>	<ul style="list-style-type: none"> <li>• Create repositories to store PII in a secure way</li> <li>• Provide controlled access to authorized personnel</li> <li>• Encrypt the storage and backup, where appropriate</li> <li>• Destroy the data permanently when requested by the owner of the data</li> </ul>

## 10. Compliance Review

Compliance to the data privacy policy shall be reviewed on an annual basis by the policy owner to ensure that there are no breaches and that compliance measurements & periodic review have been successfully implemented. We also have a compliance & a risk register in place, to track this.

In case of any case of non-adherence to compliance is observed then the policy owner will review the reason for the breach along with the head of the concerned department to evaluate the cause further.

In instances of persistent non-compliance by the individuals concerned, they shall be subject to further action as deemed appropriate.