

PRIVACY POLICY

E-InfoChips Limited (“**EL**”) is committed to respecting the privacy of every person who shares information with EL. Your privacy is important to us and we strive to take reasonable care and protection of the information we receive from you.

This privacy policy (“**Privacy Policy**”) governs the collection, storage, processing, disclosure, and transfer of your Personal Information (*as defined below*).

The terms ‘You’ or ‘Your’ refer to you as the employee of EL or a contractor engaged by EL and the terms ‘We’, ‘Us’ and ‘Our’ refer to EL.

1. CONSENT

- 1.1. By executing either your employment agreement / consultancy agreement with EL, you consent to the collection, storage, processing, disclosure and transfer of your Personal Information, in accordance with the provisions of this Privacy Policy.
- 1.2. You acknowledge that you are providing your Personal Information out of your free will. You hereby consent that the collection, storage, processing, disclosure and transfer of any Personal Information shall not cause any wrongful loss to you if it is done in accordance with the provisions of this Privacy Policy.
- 1.3. Where applicable law specifically allows you to do so, (i) you have the option not to provide us the Personal Information sought to be collected; and (ii) you will also have an option to not provide your consent or withdraw your consent at any point, provided such decision of yours be intimated to us in writing. If you do not provide us with your consent / or provide us your Personal Information or if you withdraw the consent to provide us Personal Information at any point in time, we shall have the option not to fulfill the purposes or provide you with the benefits for which the said Personal Information was sought by EL.

2. CHANGES TO THE PRIVACY POLICY

- 2.1. We may update this Privacy Policy from time to time. When we make any change to this Privacy Policy, You will be informed of such change and the “Updated” date at the bottom of this Privacy Policy will be duly updated. Your continued engagement with us after such changes have been notified to you will be deemed to be your consent to such changes.

3. PERSONAL INFORMATION COLLECTED

3.1. The kinds of information that we collect about you include but are not limited to the following:

- (i) Your name,
- (ii) Your birth date,
- (iii) Your phone numbers
- (iv) Your email address,
- (v) Your passwords,
- (vi) Various financial details such as the name of your bank, bank account details,
- (vii) Your biometric Information
- (viii) Internet Protocol address, browser type, browser language, referring URL, files accessed, errors generated, time zone, operating system and other visitor details collected in our log files,

(Collectively referred to as "**Personal Information**").

4. USE OF PERSONAL INFORMATION

4.1. Your Personal Information may be used for various purposes including but not limited to the following:

- 4.1.1. In connection with a variety of purposes relating to your employment or engagement by EL, including, but not limited to, background checks; any continuing education requirements or certification requirements.; immigration; visa and work permits; recruitment; remuneration; entitlements; benefits; incentives; leave; payroll; pensions; severance; retirement; accounts and expenses; auditing; performance management; appraisals; promotion; surveys; compliance with company policies and internal regulations; sickness; fitness for work; workplace injuries; health and safety; attendance; workers' compensation issues; career development; relocation; assignments; employee transfers; secondments; travel; insurance; business mergers; business acquisitions; business transfers; due diligence; legal, judicial, governmental and regulatory compliance; tax administration and compliance; union membership, representation, consultation and negotiations; contact for work purposes and for emergencies; company events; mentoring; counseling; complaints; employee relations; misconduct; monitoring; investigations; security; e-discovery; collection of evidence; document retention requirements; overseas affiliates' compliance with foreign laws and cooperation with overseas regulators; disciplinary action; termination and post-termination matters; outplacement services; employment certification; employment references; and other purposes related to or connected with the above;

- 4.1.2. To send messages, updates, bulletins;
- 4.1.3. To administer or otherwise carry out our obligations in relation to any agreement you have with us; and
- 4.1.4. To respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.

(Referred to as “**Purpose(s)**”)

5. SHARING AND TRANSFERRING OF PERSONAL INFORMATION

- 5.1. You authorize us to disclose, transfer, share or part with all or any of your Personal Information, across borders and from your country to any other countries across the world with our affiliates / agents / third party service providers / partners / banks and financial institutions for the Purposes specified under this Policy or as may be required by applicable law.
- 5.2. You acknowledge that some countries where we may transfer your Personal Information may not have data protection laws which are as stringent as the laws of your own country. You acknowledge that it is adequate that when EL transfers your Personal Information to any other entity within or outside your country of residence, EL will place contractual obligations on the transferee which will oblige the transferee to adhere to the obligations applicable to EL under the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 (“**Data Protection Rules**”). In the event that you wish to know the names and addresses of the third parties your Personal Information has been disclosed to, you may request the Company for such information by writing to [legal@einfochips.com].

6. SECURITY

- 6.1. The security of your Personal Information is important to us. We have adopted reasonable security practices and procedure to ensure that the Personal Information collected is secure and have a documented information security program and information securing policies available at [click here](#). You agree that such measures are secured and adequate. We restrict access to your Personal Information to our, and our affiliates', employees, agents, third party service providers, partners, and agencies who need to know such Personal Information in relation to the Purposes in this Policy and provided that such entities agree to abide by this Privacy Policy.
- 6.2. While we will endeavor to take all reasonable and appropriate steps to keep secure any information which we hold about you and prevent unauthorized access, you acknowledge that no electronic medium / security measure is 100% (one hundred percent) secure and that we cannot provide any absolute

assurance regarding the security of your Personal Information. We will not be liable in any way in relation to any breach of security or unintended loss or disclosure of information caused by us in relation to your Personal Information.

7. ACCESS

- 7.1. If you need to access, review, update, or correct your Personal Information, for any reason, you may contact us at [legal@einfochips.com] and we will take all reasonable efforts to provide you with such opportunity within a reasonable period of time.

8. DATA RETENTION

- 8.1. It is EL's policy to retain Personal Data of both current and former employees and contractors only for as long as EL believes it to be necessary for the Purposes for which the data was collected, subject to any legal requirements for the data to be retained for longer periods of time.

9. GRIEVANCE OFFICER

- 9.1. We have appointed a 'Grievance Officer' to address any concerns or grievances that you may have regarding the processing of your Personal Information. If you have any such grievances, please write to our 'Grievance Officer' at [Sudhir Naik, legal@einfochips.com] and our officer will attempt to resolve your issues in a timely manner.

October 1, 2017