

	<h1>Privacy Policy</h1>	Document No.	MECPL/Policy/ HR/ 23
		Rev. No.	00
		Rev. Date	01/08/2024

This Policy shall be called MECPL Privacy Policy. MECPL reserve the right to cancel or amend all or any part of this Policy and issue supplementary rules at any stage.

1. Overview:

When used properly, Information (data) helps companies to better understand the needs and desires of their interested parties. It also forms the basis to automate the process that help companies to evolve their operations. With increasing use of digital platforms issues like data protection and privacy have become more prominent in the public eye. At MECPL, we understand the concerns that can arise due to miss handling of collected information that are personal in nature.

MECPL is committed to safeguarding the privacy and confidentiality of any information entrusted to its care. MECPL 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.

2. Purpose:

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

3. Scope:

This Policy covers all stake holders with whom **Personal Data** is gathered by MECPL through any platform Digital or Physical.

4. Policy Statement:

A. Collecting Personal Data:

Purpose of collecting Personal Data-

Our aim is to be transparent in our collection and use of Personal Data, and we collect personal data to meet following requirements:

- 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.
- Adhering to legal and regulatory requirements
- 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.

Methods for collecting Personal Data-

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.

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

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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.

Type of Information collected:

- 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 Policy.
 - 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 employee and visitors at our locations.

Sensitive Personal Data: Apart from our own Employees, we do not generally gather sensitive or special categories of Personal Data. MECPL 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.

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 –
 - Unique identification numbers, such as driving license numbers, passport numbers and other government-issued ID numbers.
 - Biometric data, such as fingerprints and retinal scans.
 - Financial information, including bank account numbers, Pan Number etc.
 - Medical records.
 - Religion
 - Gender
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

Children’s Data:

1. MECPL does not purposefully target or cater to individuals who are younger than 18 years old through its website.
2. MECPL 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.

B. Processing 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

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entering in a contract with them, we may process their Personal Data.

- **Consent:** Data subject voluntary consent at the time they provided us with their Personal Information may be relied upon. At any moment, Data subject have the option to withdraw or modify their consent by sending an email at info@maxop.com.
- **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.

C. Transmission of Personal Data:

- On occasion, we may disclose Personal Data and it may be accessible to authorized Internal recipients within MECPL, its subsidiaries or our authorized service providers including cloud service providers who provide services to MECPL, tax consultants and authorities, Government Bodies including statutory, regulatory authorities, law-enforcement agencies (where applicable), Auditors (internal/external), depositories, Registrar & Transfer Agents.
- 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.

D. Implementation of cookies: MECPL uses both first- party and third-party cookies on our website. For more information on our Cookie Policy please refer MECPL Cookie Policy.


E. Retention of Personal Data:

We maintain Personal Data to maintain communication with data subjects, 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 for the period data subject is engaged with MECPL.

F. Security of Personal Data:

MECPL takes appropriate technical and organizational measures, to protect any personal data provided by data subject to MECPL, from accidental or intentional manipulation, loss, destruction, or access by unauthorized parties. This also applies to any external services purchased. We verify the effectiveness of our data protection measures and continuously improve them in line with technological development. Any personal data entered are encrypted during transfer using a secure encryption process.

G. Data protection privileges:

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Data subject has following rights-

- Right to erasure of Personal Data.
- Right to seek information as to all the Data custodian 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 custodian 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.

H. Concerns regarding this Privacy Policy:

Data subject can raise their inquiries or remarks regarding this Privacy Policy, exercising their Privacy Rights, or for withdrawal of their consent to the HR at info@maxop.com. We strive to provide responses no later than 30 days after receiving communications pertaining to privacy.

5. Policy Compliance:

A. Compliance Measurement: Company IT / HR / Internal Audit team will verify compliance to this Policy through various methods, including but not limited to, virtual monitoring, business tool reports, internal and external audits, and feedback from data subject.

B. Exception: There are no exceptions permitted in this Policy.

C. Non-Compliance: Any noncompliance to this Policy shall be subject to any disciplinary proceeding, or action, by the Company, which the management of the company may deem appropriate under the existing circumstances, considering the governing legislation.

6. Related standards, Policies and Processes:

MECPL Cookie Policy

7. Definitions & Terms:

MECPL: Maxop Engineering Co. Pvt. Ltd. (herein called "MECPL")

Data subject: "identified or identifiable natural person" from whom or about whom information is collected.

8. Revision History

Policy Amendment History			
Sl. No.	Amendment No.	Amendment Date	Amendment Details
1	01	01.08.2024	Initial Release

Prepared By	Verified By	Verified By	Reviewed By	Approved By
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