

# DATA PRIVACY POLICY

Policy effective from 30<sup>th</sup> December 2024





Data Privacy generally means to protect or safeguard an individual's or organization's personal or sensitive information from unauthorized access, use or disclosure. It is the right of individuals to control how, when, and to what extent their personal information is shared or communicated with others. Correspondingly, it is the obligation of the recipient of such information to handle and process it strictly in accordance with the consent provided by the individual sharing it or for any other purpose.

- **Overview and Need of the Policy-**

The Digital Personal Data Protection Act (DPDP Act) 2023, is a significant legislative development established in response to the growing concerns over the privacy and security of personal data in the digital era. The Act was formulated pursuant to the Apex Court's Right to Privacy verdict in 2017. On 24th August 2017, in the landmark case of Justice K.S. Puttaswamy (Retd.) & Anr. vs. Union of India & Ors. (2017), a nine-judge bench of the Supreme Court of India held that the right to privacy is protected as a fundamental right under Articles 14, 19 and 21 of the Constitution of India.

Following this judgment, a Committee of Experts on a Data Protection Framework for India, chaired by (retired) Justice B.N. Srikrishna, was constituted to draft a comprehensive data protection law. In 2019, the **Personal Data Protection Bill, 2019** was tabled in the Lok Sabha and referred to the Joint Parliamentary Committee on 11th December 2019. The Bill, however, raised multiple concerns among stakeholders, including the powers granted to the Government

to access personal data, the functioning of social media intermediaries, and the constitution of the Data Protection Authority. On 16th December 2021, the Standing Committee submitted its report on the **Personal Data Protection Bill, 2019**, and the Bill was withdrawn on 3rd August 2022 for the formulation of a new draft.

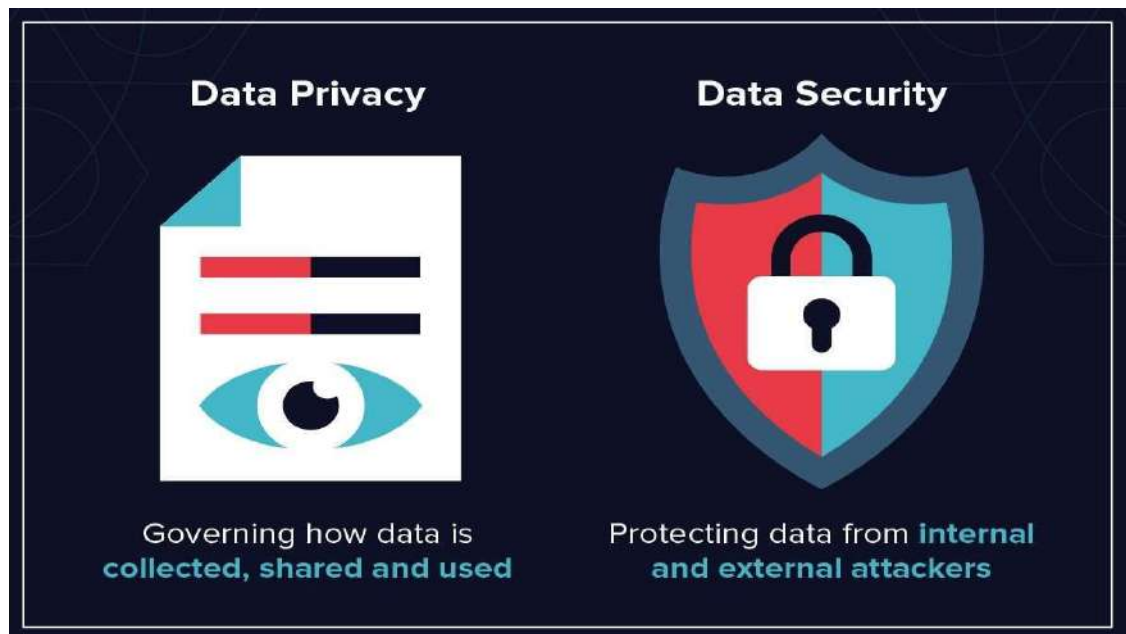
Subsequently, on 3rd August 2023, the **Digital Personal Data Protection Bill, 2023** was introduced in Parliament. This new Bill was a comprehensive piece of legislation, formed after over five years of scrutiny, deliberation, and input from various government stakeholders. After being passed by both Houses of Parliament, the Bill received the assent of the President on 11th August 2023, thereby becoming the **Digital Personal Data Protection Act, 2023** (hereinafter referred to as **DPDP Act 2023**).

In compliance with the provisions of the DPDP Act, 2023, and in our commitment to upholding the trust of our stakeholders, we have crafted this Data Privacy Policy. This Policy reflects our dedication to the secure handling and protection of personal data, ensuring transparency, and fostering trust among all individuals who entrust us with their information.



## 1. PURPOSE

The objective of this Data Privacy Policy is to set standards and/or framework for the usage and protection of personal and confidential data of our customers, employees and other individuals who interact with our organization. We are committed to ensuring the confidentiality, integrity and security of personal data by implementing appropriate measures and complying with applicable data protection laws. Our goal is to be transparent about our data storage practices, provide individuals with their rights regarding their personal data and maintain the confidentiality of employees' data throughout their tenure. Through this policy, we strive to build trust and maintain the privacy of the personal information entrusted to us.



## 2. SCOPE

The policy applies to all individuals, including customers, employees, contractors and any other individuals who avail our services or provide personal data to us. It covers all all personal data collected, processed and stored by Steamhouse India Limited (hereinafter referred to as 'Steamhouse', 'Our', 'We', 'Us') in the course of providing our services and conducting our business operations.

## 3. DEFINITIONS

a. **Data-** Data means a representation of information, facts, concepts, opinions or

instructions in a manner suitable for communication, interpretation or processing by humans or by automated means, which we collect, receive, or otherwise process in connection with use of our website.



- b. Personal Data-** Any data about an individual who is identifiable by or in relation to such data.
- c. Digital Personal Data-** Personal data in digital form
- d. Data Principal-** The individual to whom the personal data relates. For eg. Customers, Employees, Suppliers, Contractors or any person that deals/interacts with us on regular basis.
- e. Data Fiduciary-** Steamhouse, which determines the purpose and means of processing personal data.
- f. Data Processor-** Any third-party entity processing personal data on behalf of the company.
- g. Processing-** Any operation performed on personal data, such as collection, recording, organization, structuring, storage, adaptation, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.
- h. Specified Purpose-** The purpose informed to the Data Principal before obtaining the consent for processing.
- i. Certain Legitimate Purposes/Uses-** Uses/Purposes as mentioned under section 7 of the Digital Personal Data Protection Act, 2023 and which may apply to a company as formed/regulated by the Companies Act 2013

#### 4. DATA WE ACQUIRE/COLLECT

We acquire the following data-

##### a. Employee Records-

When an individual is hired as an employee at Steamhouse India Limited, we collect and maintain certain personal information and records to facilitate the employment relationship. This may include:

- i) **Name and Contact Information:** We collect the employee's full name, address, email phone number and emergency contact details. This information helps us to communicate effectively with employees and ensure their well-being at work.
- ii) **Family Information:** We collect limited family-related information such as marital status, dependent details and emergency contact information for the purpose of benefits administration and ensuring employee safety.
- iii) **Educational Background:** To verify academic qualifications and assess suitability for the role, we collect copies of educational documents such as mark-sheets, degrees, or any other educational certification.
- iv) **Employment Background:** We collect information about an employee's previous employment history, including job titles, pay slip of the preceding organization and references (if necessary). This helps us assess qualifications and experience and make informed decisions regarding their role and responsibilities within our organization.
- v) **KYC Details:** In compliance with applicable laws and regulations, we collect and maintain Know Your Customer (KYC) information, such as proof of identity (e.g. Aadhaar card, Voter ID Card, Driving License, Passport or any other proof of identity acceptable by law). This information is used for employment verification and regulatory compliance.
- vi) **Tax and Finance Details:**

PAN (Permanent Account Number) is collected for statutory compliance, including Tax Deduction at Source (TDS), issuance of Form 16 and regulatory reporting as mandated under the Income Tax Act, 1961. We also collect bank account details, including account number, IFSC code and account holder's name, for the purpose of salary processing, reimbursements or any other employment-related payments

The above information is securely stored and used solely for employment-related purposes.

##### b. Customer Information-

As a part of the steam supply arrangement with our customers, we may collect certain



representative information of our customer for the purpose of establishing and maintaining a supplier-customer relationship. This information may include, but is not limited to, the representative's name, contact details (such as email address and telephone number), Goods and Services Tax Identification Number (GSTIN) for invoicing purposes, and bank account details for processing refunds or other payments. Additionally, we collect data related to the customer's production processes to ensure the efficient supply of steam tailored to their specific needs.

**c. Contractors/Vendors-**

In the course of our operations, we may engage contractors to perform specific technical work on our behalf. These contractors are assigned responsibilities in accordance with the nature of the work required. Additionally, we procure goods and assets necessary for the operation of our business from various vendors. For the purpose of processing payments to contractors for services rendered, and to vendors for the goods and assets supplied, we collect their bank account details. This information is used solely for payment processing and related operational purposes.

**5. HOW THE DATA IS COLLECTED**

We collect personal data through various means depending on the individual or entity involved. For employees, we collect personal data either through physical forms provided during the onboarding process or via direct communication through email. For customers, data is gathered through Google Forms to gain insights on their production requirements, or alternatively, they may communicate their production requirements via email when they desire to avail our service. With respect to the Vendors/Contractors from which we purchase goods/avail services, we send a Vendor Registration Form through email, requesting essential business and financial information, including but not limited to PAN, GSTIN, bank account details, and any other relevant data necessary for processing payments.

**6. DATA COLLECTED THROUGH WEBSITE**

Our website features a 'Contact Us' section, which includes three sub-categories: 'Grievance', 'Get in touch with us' and 'Careers'. Any individual/entity may use the 'Get in touch with us' option to reach out to us with inquiries. If any customer or vendor has any complaint/grievance regarding anything, they may use 'Grievance' feature. Furthermore, individuals seeking employment may submit personal information and CV by applying for vacancies listed under the 'Careers' section of our website. In all the above cases, personal



data is voluntarily provided by the user.



## 7. DATA USAGE/PROCESSING FOR SPECIFIED PURPOSES

The data we collect shall be used/processed for the following specified purposes-

### a. Employee Data Usage-

- i) **Employment-related Processes:** We use employee data to facilitate various employment-related processes, including but not limited to, recruitment, onboarding, payroll administration, benefits management, performance evaluation and career development.
- ii) **Communication:** Employee contact information is utilized to maintain effective communication within the organization. We may reach out to employees via email, phone calls or other appropriate communication channels for work-related updates, announcements, news about the organization, alerts, promotions and information about upcoming events.
- iii) **Compliance and Legal Obligations:** We may process employee data to comply with applicable laws, regulations and legal obligations related to employment, taxation, social security and other employment-related requirements.
- iv) **Enhancing Organizational Efficiency:** Employee data may be utilized to seek suggestions and insights to enhance business operations and provide better services to stakeholders.
- v) **Fraud Prevention and Security:** We use employee data to protect against, investigate, and deter fraudulent, unauthorized, or illegal activities within or against

the organization.

**b. Customer Data Usage-**

- i) **Contractual Relationship:** The customer representative information collected is used to establish and maintain the contractual relationship. We utilize this information to communicate with customers, fulfil contractual obligations, coordinate steam supply operations, address inquiries or issues and provide necessary support related to our services.
- ii) **Customer Support and Transaction Management:** We process customer data to provide responsive support, manage requests, comments and inquiries, and ensure smooth handling of transactions. This includes managing payments, generating invoices, and completing any service-related formalities.
- iii) **Service Improvement:** We analyze customer data to improve our services, enhance customer experience, and tailor our offerings to better meet customer needs. This may include analyzing usage patterns, feedback/suggestions from customers, develop personalized recommendations and deliver high-quality services.
- iv) **Communication and Marketing:** We may use customer contact information to communicate important updates, service notifications or promotional information related to our services. These communications are designed to provide valuable information and opportunities that may be of interest to our customers. These communications may include:
  - Notifications such as confirmations, invoices, technical notices, security alerts, or support and administrative messages.
  - Information about promotions, upcoming events, or sudden updates related to our steam supply services.
  - Public announcements or marketing content featuring collaborations with customers, including their name, logo, or other identifiers, strictly with prior written consent from the customer.

**c. Vendors/Contractors' Data Usage-**

- i) **Payment Processing:** The bank account details collected from vendors/contractors are used solely for the purpose of making payments for the goods purchased/services rendered. We process this information to facilitate timely and accurate payments in accordance with our contractual agreements.



- ii) **Financial and Accounting Purposes:** The vendor/contractor data collected may be used for financial and accounting purposes, including bookkeeping, financial reporting, and auditing, as required by applicable laws and regulations.

**d. Data sharing with Data Processors-**

We may employ other companies and individuals to perform functions on our behalf. We may share the data of Data Principals with such companies/individuals to further process it on our behalf ('Data Processors'), with the requisite consent, to facilitate the purposes outlined above. This may include activities such as delivering services to customers on behalf of the Data Fiduciary, processing payments, providing marketing or promotional assistance, offering customer support, or managing the supply of products on behalf of the Data Fiduciary. All such processing or sharing of data shall be undertaken in accordance with applicable legal framework.

**e. Other purposes for which data may be processed-**

We can process certain Data where it is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of Data Principal which require protection of their data.

**8. VOLUNTARY DATA PROCESSING, PURPOSE LIMITATION AND DATA RETENTION**

- a. The collection of personal data by the Data Fiduciary will be carried out on a voluntary basis and with the free and explicit consent of the Data Principal, unless otherwise mandated by the applicable law for the time being in force. Data Principals are encouraged to provide accurate and complete information to enable the Data Fiduciary to fulfill its obligations effectively.
- b. Personal data shall be collected and processed/utilized solely for specific purposes stated above in point 7, or for any other purpose with prior written consent. Further, the personal data may be collected and processed/utilized for certain legitimate uses as outlined in this policy or as required by applicable law for the time being in force. The Data Fiduciary commits to ensuring that the data is not processed in a manner incompatible with any specified purpose or certain legitimate uses stated in this policy, except with the prior consent of the Data Principal or as legally required.



- c. Steamhouse shall, unless retention is necessary for compliance with any law for the time being in force or consented by the Data Principal to use beyond completion of the specified purpose,-
- i) erase personal data, upon the Data Principal withdrawing her consent or as soon as it is reasonable to assume that the specified purpose is no longer being served, whichever is earlier; and
  - ii) cause its Data Processor to erase any personal data that was made available by the Data Fiduciary for processing to such Data Processor.

## 9. EXEMPTION TO VOLUNTARY DATA PROCESSING

- a. The Data Fiduciary may process data collected for the following legitimate uses without any explicit consent from the Data Principal -
- i) for fulfilling any obligation under any law for the time being in force in India on any person to disclose any information to the State or any of its instrumentalities, subject to such processing being in accordance with the provisions regarding disclosure of such information in any other law for the time being in force;
  - ii) for compliance with any judgment or decree or order issued under any law for the time being in force in India, or any judgment or order relating to claims of a contractual or civil nature under any law for the time being in force outside India;
  - iii) for responding to a medical emergency involving a threat to the life or immediate threat to the health of the Data Principal or any other individual;
  - iv) for taking measures to provide medical treatment or health services to any individual during an epidemic, outbreak of disease, or any other threat to public health;
  - v) for taking measures to ensure safety of, or provide assistance or services to, any individual during any disaster, or any breakdown of public order.

**Explanation** – For the purposes of this clause, the expression “disaster” shall have the same meaning as assigned to it in clause (d) of section 2 of the Disaster Management Act, 2005; or

- vi) for the purposes of employment or those related to safeguarding the employer from loss or liability, such as prevention of corporate espionage, maintenance of confidentiality of trade secrets, intellectual property, classified information or provision of any service or benefit sought by a Data Principal who is an employee.
- vii) Any other legitimate use as may be permitted or required under any law for the time being in force.



- b. In addition to the aforementioned legitimate uses, there are specific circumstances under which the Data Fiduciary may process personal data without obtaining the explicit consent of the Data Principal. These exemptions are outlined in Section 17 of the Digital Personal Data Protection Act, 2023, or as otherwise permitted or mandated under any prevailing law.

## 10. OBLIGATIONS/DUTIES OF THE DPDP ACT 2023

Both the Data Fiduciary and the Data Principal, in good faith, shall comply with the provisions of the Digital Personal Data Protection Act, 2023. The Data Fiduciary shall adhere to the general obligations specified under Section 8 of the Act, while the Data Principal shall fulfill their duties as outlined in Section 15 of the Act.

## 11. RIGHTS OF DATA PRINCIPAL

Data Principals will be entitled to the following rights in relation to their Data:

- a. **Right to Information About Personal Data-** Data Principals may ask the Data Fiduciary to confirm what data is held about them at any time and request modifications, updates, or deletion of such data. They may also request a copy of the data held by the Data Fiduciary.
- b. **Right to Correction and Erasure of Personal Data-** Data Principals have the right to request rectification of any inaccurate or incomplete data held by the Data Fiduciary, including through the provision of a supplementary statement. They may also request the "erasure" of their data under certain circumstances.
- c. **Right to Object-** Data Principals have the right to object to the processing of their data, particularly when it is processed for specific reasons, such as direct marketing or other legitimate interests.
- d. **Right to Withdraw Consent-** Where consent has been obtained for the processing of data for specific purposes, Data Principals may withdraw this consent at any time. Upon withdrawal, the Data Fiduciary as well as Data Processor will cease processing for the specified purpose unless an alternative legal basis justifies continued processing.
- e. **Right of Grievance Redressal-** Data Principals have the right to access readily available means to register grievances with the Data Fiduciary.
- f. **Right to Nominate-** Data Principals have the right to nominate another individual who shall exercise their rights in the event of their death or incapacity.



## 12. DATA SECURITY

We will use technical and organizational measures to safeguard personal data of Data Principals and we store data on secure servers. Technical and organizational measures include measures to deal with any suspected data breach. If any Data Principal suspect any misuse or loss or unauthorized access to their Data, they may let us know immediately by contacting us by e-mail/phone.



## 13. DATA BREACH NOTIFICATION

Steamhouse has procedures in place to detect, report and respond to data breaches. Data Principals and relevant authorities shall be notified as required if there is any breach.

## 14. DATA THEFT

In simple terms means an act of illegal/ unauthorized copying, removal or stealing of confidential, valuable, or personal data/ information from an organization or business without its knowledge or consent.

Data theft could be with respect to stealing or hacking passwords, financial or banking information, personal information of clients or other employees, information of importance to a body corporate like trade secrets, client database, software's, source codes, confidential information, information which the body corporate is bound to protect, hacking into databases and many more in line with these.

## 15. MEASURES IN CASE OF DATA THEFT

While we diligently strive to protect the data entrusted to us, we acknowledge that unforeseen circumstances may arise. In the event of a data theft incident, we are committed to taking the following corrective measures:

- a. **Immediate Response:** We will respond promptly to contain the breach, minimize its impact and prevent further unauthorized access.
- b. **Notification:** We will notify the affected Data Principals and relevant authorities promptly. The notification will include details of the breach, the data involved, potential



risks and the actions taken.

- c. **Investigation:** We will conduct a thorough internal investigation to identify the root causes of the breach and take corrective actions to prevent its recurrence.
- d. **Legal Compliance:** We will fully cooperate with law enforcement and regulatory agencies as required by law. If the breach involves criminal activity, we will support legal proceedings against the responsible parties.
- e. **Communication:** We will maintain transparent and open communication with affected stakeholders, keeping them informed about the progress of remedial actions and steps taken to prevent further breaches.

## 16. CONTACT INFORMATION

For any questions, concerns, or requests related to data privacy and security, you may contact our IT and HR Team. Additionally, you can reach out to us through the grievance feature available on our website or by emailing us directly at [grievance@steamhouse.in](mailto:grievance@steamhouse.in).

## 17. POLICY REVIEW AND UPDATES

This policy shall be reviewed and updated periodically to ensure its effectiveness and compliance with evolving data protection laws and company practices. Any updates will be communicated to employees.

## 18. DOCUMENT CONTROL

This policy will be maintained and controlled by the IT and HR TEAM, and all versions will be documented and archived.

**FOR STEAMHOUSE INDIA LIMITED**



**ACKNOWLEDGMENT**

By joining Steamhouse, i agree to abide by this Data Privacy Policy. By signing below, i acknowledge that i have received and read Steamhouse India Limited's Data Privacy Policy and understand its terms and conditions.

Employee's Name: \_\_\_\_\_

Employee's Signature: \_\_\_\_\_

Date: \_\_\_\_\_

