



Privacy Policy

Version 2.0



Document Control

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Document Owner	Ruchira Kumar

Change History

Version	Nature of Change	Date of Approval	Approver
2.0	Inclusion of Grievance Officer details Inclusion of reference to Information collected from employees and customers at the beginning of engagement	20 August 2020	Nick Tanzi



Privacy Policy

GPX India II Pvt Ltd recognizes the importance of personal information and ensures the protection and safeguarding of its customers' and employees' personal information as a fundamental principle of its business and its responsibility to society. Accordingly, the organization has established the Privacy Policy described below and ensures that its management, employees, and business partners thoroughly understand and fully comply with the Policy.

This covers customers and employees of GPX India II Pvt Ltd (referred to as GPX).

I. Collection, Use and Entrustment of Personal Information

- a. GPX collects the following personal information from its customers
 - i. Name, contact number, email ID to ensure timely communication to customers – normal and/ emergency scenarios.
 - ii. Details of Government Issued identification proof for verification to allow access to Data Center premises.
 - iii. Biometric Information – only for customers who have caged areas and have their own access enabled through proximity card and biometric reader.
 - iv. Aadhar Card details for the authorized signatory at the beginning of the engagement to ensure traceability in case of any fraud

In addition, GPX collects the following personal information from its employees:

- i. Aadhar Card and PAN Card – for background verification which is an information security requirement.
- b. Personal information shall be collected only after informing the customers/ employees of the purpose and obtaining consent for doing so, except when the rights or interests of customers or third parties may be injured. The scope of use of the personal information collected is limited, and, the information shall be handled appropriately within this scope.
- c. Personal information collected by GPX shall not be provided to third parties without prior express consent of the customers/ employees, except as required by law or regulation.
- d. Only designated employees of GPX have access to this information. In case of access to third party personnel, GPX shall select the recipient with great care from among those parties that have established a sufficient level of protection of the personal information, and make necessary supervision or otherwise ensure, through a contract, etc. stipulating the level of protection to be observed, that the recipient manages the information properly.



II. Disclosure, Correction, Discontinuance of Use, etc. of Personal Information

- a. The information will not be disclosed without prior express consent of the customers/ employees, except as required by law or regulation.
- b. The GPX team will validate the information (contact details) at defined frequency to ensure currency and accuracy for the purpose it is required for.
- c. In case the details are no longer relevant, the team will delete the information from the records and the server. This will be confirmed to the management.

III. Implementation of Security Measures

GPX has implemented safeguard measures and diligently works toward preventing unauthorized access to personal information, and the loss, destruction, alteration, leakage, etc. of such information. Specific rules governing the appropriate handling and use of personal information are in place, and staff are assigned to take responsibility therefor.

IV. Observance of Laws, Regulations and Other Norms Relating to Personal Information

With respect to the observance of laws, regulations, and other norms relating to personal information, GPX management, employees, and business partners who handle personal information, comply with the laws, regulations, and guidelines relating to the protection of personal information and the privacy of communication.

V. Continuous improvements

GPX makes continuous improvements to this Privacy Policy and in-house rules and regulations to ensure that the protection of personal information as determined by socially accepted norms is conducted effectively.

For any queries and concerns or to report any violations or breach, please contact the designated **Grievance Officer**:

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