



BACKGROUND

This Policy outlines the manner in which Data, Personal Data and/or Digital Personal Data will be handled or dealt with by HSE Solutions Pvt. Ltd. ("HSE"). HSE meets the criteria of relevant information security standard requirements, including but not limited to requirements stated under the Digital Personal Data Protection Act, 2023, as amended from time to time. HSE understands the importance of handling, managing and/or processing Data, Personal Data and Digital Personal Data in strict conformity with applicable law(s). HSE will take reasonable steps to keep such data/ information confidential and may share it with affiliates and third parties on a need to know basis under appropriate arrangements. Such data/ information would generally include any data/ information which is capable of identifying you.

You agree and confirm that HSE may disclose and transfer Data, Personal Data and/or Digital Personal Data collected about you, to any of its affiliates, agents or third party service providers in connection with (i) the goods, materials and/or services you have sought from HSE, (ii) your employment with HSE or (iii) to ensure compliance with a legal or contractual obligation of HSE.

Name and address of the Company	Email address and telephone number	Name and contact details of the officer designated to ensure compliance with this policy
HSE Solutions Pvt. Ltd.		
	hse.india@prevor.com	
Office No. 1601, Ratan		
Central, Dr. Babasaheb		
Ambedkar Road, Gautam	02247497298	
Nagar, Parel East,		
Mumbai 400012,		
Maharashtra, India.		

KEY DEFINITIONS AND APPLICABILITY

"Data" means a representation of information, facts, concepts, opinions or instructions in a manner suitable for communication, interpretation or processing by human beings or by automated means

The provisions of this Policy shall not apply to—

(i) personal data processed by an individual for any personal or domestic purpose; and

[&]quot;Digital Personal Data" means personal data in digital form

[&]quot;Personal Data" means any data about an individual who is identifiable by or in relation to such data

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- (ii) personal data that is made or caused to be made publicly available by—
 - (A) the Data Principal to whom such personal data relates; or
 - (B) any other person who is under an obligation under any law for the time being in force in India to make such personal data publicly available.

Purpose of data collection, processing, or use:

With respect to Data, Personal Data and/or Digital Personal Data, HSE shall take reasonable steps to keep such data confidential and may share it with affiliates and third parties on a need to know basis under appropriate arrangements. Such data might generally include any data/information which is capable of identifying you. Notwithstanding anything contained in this Policy or any other document, you agree and confirm that HSE may disclose and transfer the Data, Personal Data and/or Digital Personal Data collected about you to any of its affiliates, agents or third party service providers in connection with the products and/or services you have sought from, or your employment with the HSE or to provide better products and/or services to you or to ensure compliance with a legal or contractual obligation of the HSE.

Provided that any data or information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as Data, Personal Data and/or Digital Personal Data for the purposes of this Policy.

HSE might:-

- ➤ ordinarily collect Data, Personal Data and/or Digital Personal Data that it believes is necessary for a lawful purpose connected with a function or activity necessary to deliver, promote or market services/products or to carry out primary business functions and/or activities, comply with applicable regulations or in the capacity as an employer or a counterparty to agreements with individuals/ customers.
- ➤ Generally collect only such data about you when you provide it or you have consented to provide or where it is required by law.
- > collect such data only by lawful and fair means and not in an unreasonably intrusive way.
- > collect such data from you when you apply for a service/product. Any such data collected will be kept confidential.

Apart from the necessity to collect your data in order to provide a service (or products) to you or maintain a business or employment relationship with you, the purposes for which HSE would generally collect and use your data will include but are not limited to:

- > complying with legislative and regulatory requirements; performing administrative functions; and
- > offering products and services that may be of interest to you.

The Data, Personal Data and/or Digital Personal Data collected from you may be collected and/or retained either directly by HSE or through or with an affiliate or third party. HSE will be able to share the names and addresses of entities that may collect and/or retain such data, upon receiving a valid and written request in this regard. HSE, its affiliates and third parties it shares data with, will not retain the data collected for longer than is required for the purposes for which such data may be lawfully used or is otherwise required under any law for the time being in force. The data collected shall be used for the purpose for which it has been collected. You

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have the option not to provide HSE with the data sought to be collected. You also have the option to withdraw the consent given earlier provided it is sent to us in writing. Wherever necessary, HSE will seek your consent in writing, in the form of a letter, email, fax or in any other electronic form. You shall be given the option to not provide or refuse to provide the data sought by us. However, if you opt out, HSE will not be able to provide the related product and/or service to you. While providing Data, Personal Data and/or Digital Personal Data of another natural person to HSE, appropriate authorization of that natural person will be obtained.

Recipients or categories of recipients to whom the data may be disclosed:

Ordinarily, HSE will not use or disclose Data, Personal Data and/or Digital Personal Data collected about you to a third party otherwise than for the purposes set out in this Policy, unless the disclosure is necessary for compliance of a legal obligation or where it is agreed to in the contract with you or as consented by you. HSE will also not publish the Data, Personal Data and/or Digital Personal Data unless the same is required for compliance of a legal obligation or as consented by you. Provided that such data shall be shared without your consent, with government agencies mandated under law to obtain data/ information for the purpose of verification of identity or for prevention, detection, investigation including cyber incidents, prosecution and punishment of offences. Notwithstanding anything contained in this Policy, any Data, Personal Data and/or Digital Personal Data might be disclosed to any third party if required by an order under a law for the time being in force. You authorize HSE to disclose necessary Data, Personal Data and/or Digital Personal Data to affiliates, agents or third party service providers who provide services to HSE in connection with the services/products you have sought from, or, your employment with HSE. These parties will be barred from using your Data, Personal Data and/or Digital Personal Data except for the specific purpose for which HSE supplies it to them and from disclosing it further. Subject to what is permitted by law, the types of third parties (whether in India or overseas) to whom your Data, Personal Data and/or Digital Personal Data might be disclosed to may include:

- ➤ agents, contractors, service providers, data fiduciaries and external advisers engaged by HSE from time to time to carry out, provide services or advise on the functions and activities;
- > other related bodies corporate /affiliates of HSE
- regulatory bodies, government agencies, law enforcement bodies and courts; and
- > any person who HSE deems necessary for carrying out the instructions you give to HSE.

Time limits for the deletion of data and access

Data, Personal Data and/or Digital Personal Data will be deleted if the purposes mentioned under this policy cease to apply. You may review the Data, Personal Data and/or Digital Personal Data you have provided to us for the purpose of ensuring the said data is accurate. HSE shall not be responsible for the authenticity of the data you have supplied to it or to any person acting on its behalf. HSE may not be able to provide access to data which is not directly provided by you. HSE may charge you a fee for accessing your data.

Data transmission to other jurisdictions

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HSE may transfer your Data, Personal Data and/or Digital Personal Data to any person or entity whether in India or located in any other country that ensures a similar level of data protection when the same is necessary for the performance of a lawful contract with you or where you have consented to such transfer. The data transferred might include such data provided to HSE either directly by you or by any legal entity with whom you are associated with in any capacity.

Analytics

This website uses web based tools including but not limited to Google Analytics, a web analysis service provided by Google inc. ("Google"). Google Analytics uses so-called "cookies", text files that are saved on your computer and enable analysis of your use of the website. The information about your use of this website generated by the cookie (including your IP address) is transferred to a Google server in the United States and is saved there. Google will use this information in order to analyze your use of the website, compile reports on website activity for the website operators and provide further services related to website usage and internet usage. Google will also, where applicable, transfer this information to third parties where this is a legal requirement, or insofar as third parties process this data on Google's behalf. Google will not link your IP address to other data saved by Google under any circumstances. You can prevent the installation of cookies by appropriately setting your browser software; however, we would like to point out that this may result in not being able to use all functions of HSE's website to the full extent. You can at any time object the collection and use of your IP address with Google Analytics. Please note that the Google Analytics code "gat. anonymizelp ();" is used on this website. This means that IP addresses are anonymized by removing the last octet of the visitor's IP address prior to its use and storage. Please do not hesitate to contact HSE with any questions you may have regarding the processing of your personal data.

Security

HSE has adequate security practices and procedures to ensure that its data / information assets are adequately protected. HSE strives hard for ensuring that the Data, Personal Data and/or Digital Personal Data it holds is protected from misuse, loss and unauthorized access, modification, or disclosure.

HSE will be bound to report data breach incidents, if any, to the authority(ies) as stipulated under the Digital Personal Data Protection Act, 2023.

Amendments

This Policy may change from time to time. You may access a current version of the Privacy Policy from the HSE Solutions website (www.hsesolutions.in)