

Policy Name:	Data Privacy Policy		
Effective From:	01 October 2023	Validity	Till next revision based on Statute and management decision.

Introduction

At Bits In Glass India Private Limited ("BIG-India" or "we"), we recognize the importance of safeguarding your privacy and ensuring compliance with the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011. This privacy policy outlines how we collect, use, disclose, and protect personal data, including sensitive personal data or information (SPDI), as defined by the Rules.

1. Definitions

In this privacy policy, the following terms have the meanings ascribed to them under the Rules:

- **Personal Data:** Any information related to an identified or identifiable person.
- **Sensitive Personal Data or Information (SPDI):** Data that includes information such as financial details, passwords, biometric data, sexual orientation, and any other data specified under the Rules.

2. Data Collection and Usage

We collect personal data, including SPDI, through various means and use it for the following purposes:

- **Website Access:** When you visit bitsinglass.com or its affiliate websites, our web servers or analytics providers may collect data, including but not limited to:
 - IP addresses,
 - Operating system details,
 - Browsing details,
 - Language settings.

We use this data to measure website usage, improve content, enhance security, and optimize performance.

- **Registration:** In certain situations, you may be required to register to access authenticated areas of our website. During registration, we will collect your username and password.
- **Third-Party Data:** We may obtain data from third parties, such as service providers who use your IP address to customize offerings and content based on your location.
- **Queries and Support:** When you contact us with queries or support requests, we may process personal data, including:
 - Personal and contact details (e.g., full name, company name, email, phone number),



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- Demographic data,
- The content of your messages to us.

3. Data Sharing

We may share your personal data, including SPDI, with third parties, including third-party service providers and entities within the BIG group, for legitimate business purposes. We do not sell your personal data to third parties.

Third-party service providers: Our third-party service providers, including contractors and agents, may assist us with activities such as hosting, data storage, marketing research, and event management. They are contractually obligated to safeguard your data in compliance with our policies.

Entities within the BIG group: We may share your personal data with other entities in the BIG group for purposes including reporting, business reorganization, system maintenance, and hosting.

4. International Data Transfers

We may transfer your personal data, including SPDI, to countries outside your country of residence, including India. To ensure the security of your data in accordance with your local laws, we have implemented appropriate measures. For further information on these measures, please contact our Data Protection Officer at email grievance.india@bitsinglass.com.

5. Data Security

We have implemented technical, organizational, and security measures to protect your personal data from unauthorized access, loss, alteration, or disclosure. Access to your personal data is restricted to individuals and entities with a legitimate business need, who process it according to our instructions and applicable law.

6. Data Retention

We will retain your personal data only as long as necessary to fulfill the purposes for which it was collected, including legal, accounting, or reporting requirements. In some cases, we may anonymize your data for further use.

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7. Right to Withdraw Consent

If you have provided consent for specific data processing, you have the right to withdraw that consent based on your country of residence. To do so, contact our Data Protection Officer. Upon receiving your withdrawal, we will cease processing your data for the specified purposes unless we have an alternative legal basis for processing.

Grievance Redressal Process

1. How to File a Grievance

If you have a grievance or concern related to our privacy policy or the handling of your personal data, please follow these steps:

- Contact our Data Protection Officer (DPO) by sending an email to grievance.india@bitsinglass.com or by using the contact details provided on our website.

2. Information to include in your Grievance

When filing a grievance, please provide the following information:

- Your full name and contact details.
- A clear description of the grievance or concern.
- Any supporting documents or evidence related to the grievance.

3. Acknowledgment of Grievance

Upon receiving your grievance, our DPO will acknowledge the receipt within 3 business days. The acknowledgment will include a unique reference number for tracking purposes.

4. Review and Investigation

Our DPO will review and investigate your grievance promptly. This may involve consulting relevant stakeholders and examining relevant records or documents. The aim is to resolve the issue and prevent its recurrence.

5. Response

After the investigation is complete, we will provide a written response to your grievance within 7 business days. The response will include:

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- A summary of the investigation findings.
- Any actions taken or to be taken to address the grievance.
- Any remedies or compensation, if applicable.
- Contact information for further communication.

6. Escalation

If you are not satisfied with the response provided, you have the right to escalate the matter to the relevant regulatory authority under the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011.

7. Continuous Improvement

We are committed to learning from grievances and continuously improving our data protection practices. Your feedback is valuable in helping us achieve this.

8. Contact Information

If you have any questions about the grievance redressal process or need to file a grievance, please contact our Data Protection Officer at grievance.india@bitsinglass.com.

Prepared and Checked By:	Approved By:	Policy Version
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