

# RELIABLE AUTOTECH PVT. LTD.

## PRIVACY POLICY

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| Document Ref Number        | ISMS-36                        |
| Document Version           | Ver.1.3                        |
| Effective Date             | 28/11/2023                     |
| ISO 27001:2022 Requirement | ISO/IEC 27001:2022 –CL 8.1     |
| Annex A Control Mapping    | A.5.1, A.5.14, A.5.34, A.8.11, |

**Disclaimer:** The Company reserves the right to adopt, modify, revise, or amend this policy as may be deemed appropriate, at any time in whole or in part, for any reason and without prior notice, consent, or approval. The Company has absolute discretion to make the sole and final determination of any and all issues arising out of this policy. This policy contains proprietary and confidential information and is for internal use and distribution only.

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| Doc Title: Privacy Policy                | Classification: Public                   | Doc Ref. No.: ISMS-36 |
| Document Owned by: Mr. Saagar Bhavsar    | Document Maintained by: Mr. Anand Lakade | Doc. Version: Ver.1.3 |
| Document Approved by: Mr. Devendra Bapat |  | Page 1 of 14          |

**Documents Information and Revision History**

| Document Ref No./Name | Document Name  |
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| Version | Revision Notes | Owner              | Reviewer           | Approver           | Effective Date |
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| 1.3     | Nil            | Mr. Saagar Bhavsar | Mr. Rohit Agharkar | Mr. Devendra Bapat | 28/11/2023     |

**Supporting Departments**

The following individual(s) / function(s) / department(s) are required to support for effective implementation of this Delegation of Authority Policy

| S.No. | Date | Name | Functions / Department |
|-------|------|------|------------------------|
| 1     | Nil  | All  | All                    |

**Control of Document Delegation of Authority Policy**

This document is in line with the requirements of the Information Security Management System ISO/IEC 27001:2022. This document:

- (a) Aligned to the company’s requirements by **Mr. Saagar Bhavsar**.
- (b) Reviewed by **Mr. Rohit Agharkar**
- (c) Owned by **Mr. Saagar Bhavsar**
- (d) Maintained by **Mr. Anand Lakade**

This document was approved by **Mr. Devendra Bapat, Director** and is issued on a version-controlled basis under his signature.

**Distribution**

A current version of this document is published for all concerned on the Reliable Autotech Pvt. Ltd.’s Intranet (HRMS portal) and their acceptance is recorded electronically.

**Date: 28/11/2023**

  
**Signature on behalf of Approving Authority:**  
**(Mr. Saagar Bhavsar)**

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## 1 ISO/IEC 27001:2022 Requirements

### 1.1 Clauses

**Clause 8.1 - Operational planning and control** - The organization shall plan, implement and control the processes needed to meet information security requirements, and to implement the actions determined in 6.1.

### 1.2 Controls Objective

A.5.1 – Policies for Information Security

A.5.14 – Information transfer

A.5.34 – Privacy & protection of Personal Identifiable Information (PII)

A.8.11 – Data masking

## 2 INTRODUCTION

**Reliable Autotech Private Limited**, hereinafter referred to as **“We”, “Us”, “Our”, “Company”** or **“RELIABLE”**.

This privacy policy has been created in accordance with all applicable laws [hereinafter referred to as **“Privacy Policy”** or **“Policy”** or **“Privacy Statement”**] and applies to all visitors of this website <https://www.Reliableautotech.com/>

We hereby request our visitors to read this Privacy Policy, together with any privacy statement may be provided on specific occasions when any information is being collected or processed about you so that you are aware about the usage of the Information. By entering/ visiting this website, the visitor consents to the terms of this policy.

By submitting his/her information to us, the visitor will be treated as having given his/her permission for processing the same in a manner provided in this policy.

## 3 SCOPE

### 3.1 GOVERNING LAW

This Privacy Policy has been prepared in accordance with applicable Indian laws, the Indian Information Technology Act, 2000 mainly:

1. The Information Technology Act, 2000.
2. The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011.

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### 3.2 APPLICABILITY

This Policy applies to all visitors, users and others (hereinafter referred to as “You”) who access or use the website <https://www.Reliableautotech.com/> and who provide their information to **RELIABLE**.

### 3.3 OBJECTIVE

**This Privacy Policy will primarily help you understand:**

1. The nature of information we collect about **you directly or through third parties**.
2. The sources from where **your** information is collected.
3. The way **your** information is collected.
4. The purpose of collecting **your** information/ data
5. The way **your** information is stored, used and processed by
6. The rights **you** have under applicable laws regarding such information collected by our website.
7. The process to contact **RELIABLE** for any issues regarding the collection or use of your data.
8. Any disclosure to third parties within or outside India we may do of **your** information for specific circumstances with the reasons specified.
9. Data security measures we apply to protect **your** data.

## 4 POLICY

### 4.1 PERSONAL INFORMATION WE COLLECT

**We may collect the following information:**

Personal information is information related to **You**, or a combination of pieces of information that could reasonably allow **You** to be identified. Personal information may consist of full name, personal contact numbers, job title, residential/ official address, email address, demographic information such as postcode, preferences and interests or date of birth.

While information such as date of birth in isolation may not be enough to uniquely identify the visitor, a combination of full name and date of birth may be sufficient to do so. It does not include data where the identity has been removed [anonymous data].

If any information is submitted pertaining to any Personal Information relating to other people other than yourself to **RELIABLE** or to **RELIABLE** 's service providers in connection with the lawful contract or business purpose with us, **you** represent and warrant

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that **you** have the authority to do so and to permit **RELIABLE** to use the information in accordance with this Privacy Policy.

#### 4.2 HOW DO WE COLLECT YOUR INFORMATION?

We collect Information about **you** through the following means:

1. When **you** use our website
2. When **you** contact **RELIABLE**
3. When **you** put enquiry into our website about a product or email us.
4. When **you** interact with **RELIABLE** via email or social media platforms such as Facebook, LinkedIn, Instagram, or Twitter
5. When you connect with us on any other third-party portal where we have an active company account.
6. When **you** upload your details for an opportunity at **RELIABLE**.
7. When you subscribe to our newsletter.
8. When **you** otherwise voluntarily provide your Personal Information and/or Sensitive Personal Information.
9. By any other means incidental to our business.

#### 4.3 WHY WE COLLECT YOUR INFORMATION

**RELIABLE** will collect adequate, relevant, and necessary **information of yours**, and will process such information fairly and lawfully for the purpose it is collected. Most commonly, **RELIABLE** will use **your information** in the following circumstances:

1. To connect with **you** when you enquire at our website for any of our product or service or any other business website where we have an active account.
2. To consider **your** application for career opportunity with Reliable
3. For business, marketing, and promotional purposes such as sending information about special promotions, programs, schemes, orders, new features, plans on products/services and marketing communications that we believe may be of interest to you.
4. To perform the contract which **you** may have with us for using our product/service or supplying us any product/service or any other business purpose.
5. To allow **you** to subscribe to our news alerts so that we can keep **you** updated about our latest updates.
6. Compliance with legal obligations.
7. To enable **you** to use our services;
8. To share statistical information, with third parties, about our users but those third parties will not be able to identify any individual user from that information.
9. To consider an application from prospective vendor for participating with
10. To improve and customize our services in accordance with **your** feedback;

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11. To send you important information regarding the websites, changes in terms and conditions, user agreements, and policies and/or other administrative information
12. To investigate potential breaches, or to protect the rights, property or safety of **RELIABLE**, the Users of our Sites or others.
13. For any other purpose necessary or incidental to our business and/or to enforce our Terms of Use or other applicable policies.
14. For any other purpose for which you give your express or implied consent.
15. For internal business operations including:
  - a. Reviews and data analysis for the website (e.g., to determine the number, category of visitors to specific pages within the website).
  - b. To manage, operate, maintain and secure our website/Apps, network system, and other assets and to customize/personalize your experience with us, which may include displaying content based upon your preferences.
  - c. For the purposes of analysing the use of the website/Apps, enabling and monitoring your use of our website/Apps operating our website/Apps, ensuring the security of our website /Apps, for maintaining back-ups of our databases.
16. To help diagnose problems with our server, and to administer our website/Apps.

#### 4.4 CHANGE OF PURPOSE

We will only use **your Information** for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use **your Information** for any additional purposes, we will notify **you** and we will explain the legal basis which allows **RELIABLE** to do so.

#### 4.5 CONSENT

**You** agree that we do not need any additional or further consent from **you** to use **your Information**, in accordance with this policy to carry out our legal obligations or exercise specific rights.

#### 4.6 INFORMATION SHARING AND DISCLOSURE

We may disclose **your information** to any of our employees, officers, professional advisers, agents, suppliers, or subcontractors; or to any member of our company, including our subsidiaries and partners insofar as reasonably necessary for the purposes set out in this policy and for the purpose of providing services to **you**.

In addition to this, we may disclose **your information**:

1. to the extent that we are required to do so by law;

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2. in connection with any ongoing or prospective legal proceedings;
3. in order to establish, exercise or defend our legal rights including providing information to others for the purposes of fraud prevention and reducing credit risk;
4. to the purchaser or prospective purchaser of any business or asset that we are or are contemplating selling; and
5. to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that information.

**RELIABLE** ensures that our third-party service providers employ industry standard security measures to ensure the security of information through legally binding terms and conditions. Except as provided in this policy, we will not provide your Information to any other third party.

#### 4.7 USE OF COOKIES – HOW WE COLLECT

We, and our partners, use various technologies to collect and store information when you visit <https://www.reliableautotech.com> and this may include using cookies or similar technologies to identify your browser or device. Cookies are pieces of information stored directly on the computer or mobile device that you are using.

We use the following types of cookies:

##### 1. Necessary cookies

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

##### 2. Preference cookies

Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.

##### 3. Statistics cookies

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain or all features on the website.

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#### 4.8 THIRD-PARTY LINKS

Occasionally, at our discretion, we may include or offer third-party products or services on our website or service. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

#### 4.9 ADVERTISING

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users.

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We have not enabled Google AdSense on our website, but we may do so in the future.

#### 4.10 SOCIAL MEDIA

RELIABLE maintains online presences in social networks to communicate with the respective users and offer a wide range of information.

We have no direct influence on the processing of the data and therefore expressly point out that processing is also possible outside the EU. This may result in risks for the user, e.g. because the enforcement of rights is made more difficult, or the data is subject to another law. In general, however, we would like to point out that by offering services in Europe, network operators are obliged to comply with EU data protection standards. In addition, user data within social networks is generally used for advertising and market research purposes. For example, user profiles are created which are then used to advertise specifically for the user. Cookies, small files that are stored on your device, are generally used for this purpose. However, the user profiles may also contain device-independent data, especially if you log into the corresponding network.

For detailed information on the stored data and the possibility of objection, please refer to the respective data protection declaration of the operators of the respective network. We also point out that in the case of requests for information and the assertion of rights of data subjects, these can be asserted most effectively with the providers. Only the providers have access to the data of the users and can directly take appropriate measures and provide information. Should you nevertheless need help, you may also contact us.

**Processed data types:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text input, photographs, videos), usage data (e.g.

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websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).

**Data subjects:** Users (e.g. website visitors, users of online services).

**Purposes of processing:** contact enquiries and communication, tracking (e.g. interest profiling, use of cookies), remarketing, range measurement (e.g. access statistics, recognition of returning visitors).

#### **4.11 TRANSFER OF INFORMATION OUTSIDE INDIA**

Unless stated otherwise, we store and process **your Information** in India. There may, however, be occasions when we need to transfer **your Information** outside India to enable **RELIABLE** to use the information in accordance with this policy. Such transfer of information may be to a country which does or does not provide the same level of data protection as in India. In these circumstances, we will take appropriate steps to ensure that **your Information** is adequately protected. **You** expressly agree to transfer your information described in this Section.

#### **4.12 DATA CONFIDENTIALITY AND SECURITY**

We are committed to protecting **your information** and thus implement appropriate technical and organizational security measures to protect it against any unauthorized or unlawful processing and against any accidental loss, destruction, or damage. Appropriate physical, electronic, and managerial procedures have been put in place to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information collected from **you**. We strive to keep **your** personal information protected and take reasonable effort to safeguard that proper security and technical controls are applied to ensure data security.

We will not use, rent, sell, transfer, or otherwise expose the contents of the tracking information resulting from click through, message opened, message read, or e-commerce conversions. We maintain all customer data in a secure facility protected by firewalls and other security devices.

We are certified for IATF 16949:2016 (International Automotive Task Force), and we under the framework of such certification. Further, we adopt and adhere to the best industry standards and international practices.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all the information you supply is encrypted via Secure Socket Layer (SSL) technology.

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#### 4.13 DATA PROTECTION RIGHTS

Reliable would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

**The right to access:** You have the right to request Reliable for copies of your personal data. We may or may not charge you a small fee for this service.

**The right to rectification:** You have the right to request that Reliable correct any information you believe is inaccurate. You also have the right to request Reliable to complete the information you believe is incomplete.

**The right to erasure:** You have the right to request that Reliable erase your personal data, under certain conditions.

**The right to restrict processing:** You have the right to request that Reliable restrict the processing of your personal data, under certain conditions.

**The right to object to processing:** You have the right to object to Reliable's processing of your personal data, under certain conditions.

**The right to data portability:** You have the right to request that Reliable transfer the data that we have collected to another organization, or directly to you, under certain conditions. If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us (contact details shared below).

#### 4.14 DATA RETENTION

We will only retain **your information** for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In some circumstances we may anonymize **your information** so that it can no longer be associated with **you**, in which case we may use such information without a further statement to **you**.

#### 4.15 WITHDRAWAL OF CONSENT

**You may at any time revoke or withdraw your consent to provide your information to RELIABLE by using the applicable contact details set out at the end of this policy. In case of withdrawal of consent, RELIABLE may not be able to provide the same level of experience to you as RELIABLE will not be aware of your preferences.**

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#### 4.16 RIGHT TO DELETION

You may at any time ask **RELIABLE** to delete **your Information**. We will consider and where necessary comply with **your** request in accordance with applicable law, as explained above.

#### 4.17 CHANGES TO THIS PRIVACY POLICY

The policy is subject to modification from time to time. If we decide to change our policy, we will post those changes here so that you will always know what information we gather, how we might use that information and whether we will disclose it to anyone.

We may also notify you in other ways from time to time about the processing of your Information.

#### 4.18 GOVERNING LAWS AND DISPUTE RESOLUTION

The courts of Nashik, Maharashtra, India shall have exclusive jurisdiction in respect of all matters arising out of, or concerning or incidental to using of the website / Website. The parties hereby consent to the exclusive jurisdiction of Nashik courts (and of the appropriate courts therefrom) and irrevocably waives, to the fullest extent permitted by law, any objection which it may have now or hereafter to the jurisdiction of courts at Nashik, Maharashtra, India.

#### 4.19 CONTACT US

If you have any questions or complaint about this policy, please reach us on below link

<https://akath-whistleblowing.reliableautotech.com>

## 5 COMPLIANCE

The Head IT will ensure compliance with this document. The designated Auditor will verify the compliance with this document in accordance with ISMS Audit Policy covered under ISO/IEC 27001:2022 Clause 5.3 and Control A.5. ISMS committee will ensure closure of Non-Compliance Report (NCR) in timely manner and with appropriate Root Cause Analysis (RCA) and appropriate corrective and preventive action.

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## 6 ACKNOWLEDGEMENT

### Acknowledgment of Reading and Acceptance of this Delegation of Authority Policy

I hear by acknowledge that I have read and understood the above-mentioned Delegation of Authority Policy. I also understand that the actions of acceptance of this policy will be logged for necessary compliance purpose.

|                     |              |                  |  |
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| 1.0                 | Anand Lakade | 01/04/2021       | Initial  |
| 1.1                 | Anand Lakade | 31/03/2022       | Last and Next Review Date added                            |
| 1.2                 | Anand Lakade | 01/06/2023       | Clause 4.19 added & Update footer                          |
| 1.3                 | Anand Lakade | 28/11/2023       | Changes made in clause 1 as per ISO 27001:2022 requirement |

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