

Munjal Kiriu Industries Private Limited

Data Privacy Policy



Confidentiality Agreement

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K. Saravanan	Ravee Kant Sharma	Vijay Pal Singh	Controlled copy STAMP	Revision detail	
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Document Reviewers

Reviewed by	Approved by	Final Comments
Subhankar Saha	Mr. K. Saravanan (MD)	Initial Document

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1. Introduction

Munjali Kiri Limited (“Company”, “we”, “our” or “us”) is committed to safeguarding the privacy and protection of personal data belonging to individuals whose information we process. This Data Privacy Policy sets out our approach to the collection, use, disclosure, storage, and protection of Personally Identifiable Information (PII), in compliance with applicable data protection laws, including the Digital Personal Data Protection (DPDP) Act, 2023 (as updated from time to time).

By accessing or using our websites, applications, products, systems, or services, you acknowledge and consent to the data collection, handling, and processing described in this policy.

2. Scope

This policy applies to all personal data processed by Munjal Kiri Limited and includes:

- All forms of data—electronic and physical
- All categories of individuals—employees, customers, vendors, and other stakeholders
- All business functions and operations
- Third-party service providers and processors
- All digital platforms and systems used for data processing

3. Definition of Personal Data

Personal Data refers to any information that identifies, or can reasonably be used to identify, an individual, either directly or indirectly. This includes, but is not limited to:

- Name, address, phone number, and email ID
- Government-issued identification numbers (e.g., PAN, Aadhaar)
- Financial or health-related information
- IP address, geolocation data, and device identifiers
- Biometric or demographic details

4. Principles of Privacy Protection

We follow the following principles when processing personal data:

- Lawfulness, Fairness, and Transparency
- Purpose Limitation
- Data Minimization

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- Accuracy
- Storage Limitation
- Integrity and Confidentiality
- Accountability and Transparency

5. Types of Personal Data Collected

We may collect the following types of personal data:

- Contact and identification details
- Device and browser data (via cookies and tracking)
- Interaction and usage logs (from websites and services)
- Employment or HR-related data
- Data from third-party social media logins (e.g., LinkedIn, Google)

6. Purpose of Data Processing

Personal data is collected and used for the following purposes:

- Providing, maintaining, and improving our products & Services
- Managing user accounts and transactions
- Responding to queries and support requests
- Fulfilling legal and contractual obligations
- Sending promotional communications
- Conducting analytics and market research
- Performing internal audits and ensuring regulatory compliance

7. Legal Basis for Processing

We process personal data based on the following legal grounds:

- User consent
- Contractual necessity
- Legitimate business interests
- Compliance with judicial or regulatory authorities

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- For training and quality improvement purposes

8. Data Sharing and Transfers

We may share personal data, within &/or outside India, with:

- Authorized third-party service providers (under strict agreements)
- Regulatory authorities and law enforcement, if required
- Affiliates, subsidiaries, or partners (for lawful purposes)
- In case of business reorganization or acquisition

All data transfers are conducted with appropriate safeguards in place.

9. Data Retention and Disposal

We retain personal data only for the duration necessary to fulfil the purposes outlined in this policy or as required by law. Once no longer needed, data is securely archived or deleted.

Refer to: MKI/ISMS/30-Data Retention Policy

10. Data Privacy Risks and Mitigation

We recognize key risks associated with personal data processing and have implemented appropriate controls to mitigate them.

Risk Category	Description	Controls Implemented
Unauthorized Access	Risk of internal or external unauthorized data access	- Role-based access controls for IT systems and Applications. - Multi-Factor Authentication (MFA)- for IT Systems and Applications. - Audit logs for IT systems and Applications. - Physical security measures for office and plant locations
Data Breach or Leakage	Accidental or malicious disclosure of data	- Network firewalls - Data encryption (in transit and at rest) - Incident response procedures
Non-Compliance	Failing to meet DPDP or contractual data protection requirements	- Periodic privacy audits - Policy enforcement - Legal compliance reviews

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Inappropriate Sharing	Sharing data without a lawful basis or proper consent	- Third-party risk assessments - Vendor agreements (Data Processing Agreements - DPAs)
Improper Data Retention	Retaining data longer than needed	- Defined data retention and disposal policy

11. Data Principal Rights

Individuals whose data we process have the following rights:

- to access and review their data
- to correct inaccurate or incomplete data
- to withdraw consent at any time
- to request data deletion (subject to legal requirements)
- to restrict or object to processing
- to data portability (where applicable)

Requests can be submitted to itsupport@munjalkiriu.co.in

12. Children's Privacy

We do not knowingly collect personal data from children under the age of 18. If we become aware of such data collection, we will delete it immediately.

13. Security of Personal Data

We implement a layered security architecture to protect personal data, including:

- Endpoint protection
- Data encryption (both at rest and in transit)
- Intrusion detection and vulnerability scans
- Regular employee training on privacy best practices

14. Data Breach, Notification & Grievance Redressal

Munjali Kiriu Limited shall follow the Guidelines as prescribed by the Computer Emergency Response Team (CERT-in) / SEBI, DPDP Act, and the Chief Information Security Officer (CISO) will be responsible for handling data breaches, notification, and redressal of Data Breach Incidents.

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15. Changes to This Policy

Munjal Kiriu Limited may update this policy periodically. The latest version will be posted on our website with the revised “Last Updated” date.

Contact Information

For any privacy-related inquiries or to exercise your rights, please contact:

The Grievance Officer (DPO) – Munjal Kiriu Limited

Address: Plot #192, Sector – 4, Phase II, IMT Manesar, Gurgaon – 122 050, Haryana, India

Email: itsupport@munjalkiriu.co.in

Phone: +91-95600 24449

Website: <http://munjalkiriu.co.in>

Retention Period

Annexure -A

Documents shall be retained in the following manner: - legal & CS

S. No.	Retention Period	Type of Record
1	Documents that are required to be preserved permanently	1. Registration/Incorporation Certificates, Licenses, and statutory approvals 2. Memorandum and Articles of Association of the Company 3. Minutes of Board Meetings, Committee Meetings, and General Meetings 4. Registers as required by the Applicable laws 5. Agreements with Stock Exchanges, Depositories, and other Authorities 6. Investment documents of Subsidiaries and Associates 7. Orders issued by Courts and Statutory Bodies 8. Documents related to real estate, including title documents 9. Any other documents as prescribed under applicable law
2	Documents that are required to be preserved for a minimum period of 8 years	1. Books of accounts 2. Income Tax returns and tax records 3. Agenda and related papers shared with the Board of Directors for meetings (as required by law) 4. Disclosure of Interest received from Directors and Senior Management 5. Annual Returns

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		6. Correspondence with shareholders and Statutory Bodies 7. Other material contracts and arrangements 8. Any other documents as prescribed under applicable law
3	Any other Documents	As may be prescribed under any applicable law for the time being in force.

Dos and Don'ts for Users

Munjali Kiri Limited is committed to safeguarding your privacy and data security. Follow these Do's and Don'ts to protect personal information and uphold our trust and compliance standards!

Category	Dos (Best Practices)	Don'ts (Avoid These Mistakes)
Handling Personal & Sensitive Data	Share sensitive data only through trusted and secure platforms.	Don't share personal/company data on unverified platforms.
	Verify email senders and links before clicking.	Don't provide sensitive details over the phone/email unless verified.
Following Company IT & Privacy Policies	Adhere to company data protection and privacy policies.	Don't bypass security measures or disable antivirus software.
	Report suspicious activities to IT/security teams.	
Data Storage & Disposal	Shred printed documents with sensitive information.	Don't leave printed documents with personal/company data unattended.
	Use secure delete tools for electronic files.	
Privacy & Data Protection	Collect only the minimum necessary personal information.	Don't store or share personal data without encryption.
	Use data masking when handling sensitive information.	Don't access, modify, or share customer/employee data without proper authorization.

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	Ensure proper consent before sharing personal data.	
Third Party & External Sharing	Share data only with authorized vendors and partners.	Don't share or expose company/customer data to unauthorized third parties.
	Ensure third-party compliance with privacy policies.	Don't use unapproved cloud storage or sharing platforms.
Social-Media & Public Sharing	Be mindful of what you post online, especially work-related content.	Don't disclose customer/company information on social platforms.
	Limit personal data exposure on social media.	Don't use work credentials on personal accounts/social media accounts.

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