

Privacy Policy

1. OBJECTIVE

Yamuna International Airport Private Limited (“the Company”, “we”, “us, or our”) recognizes the criticality of the Personal Data or Information, and in its endeavour to achieve the objective of providing the highest level of protection to the Personal Data or Information, this policy is being framed. This policy (the “Privacy Policy”) explains which Personal Data or Information we collect, when and why we collect the Personal Data or Information, how we use them, the conditions of our disclosure to third parties, as well as how we secure the stored Personal Data or Information. The purpose of this policy is to maintain the privacy of and protect the Personal Data or Information of employees, contractors, vendors, interns, associates, customers and business partners of the Company.

“Personal Data or Information” means any information that relates to a natural person which, either directly or indirectly, in combination with other available or likely available information, may identify that person which may include date of birth, bank account details, medical history, KYC documents.

“Provider(s)” includes the Company’s employees, contractors, vendors, interns, associates, customers and business partners who provide Personal Data or Information to the Company.

2. SCOPE & EFFECTIVE DATE

2.1 This policy is applicable to all employees, contractors, vendors, interns, associates, customers and business partners who provide Personal Data or Information to the Company. The policy shall apply mutatis mutandis to those including but not limited to employees, contractors, vendors, interns, associates, customers and business partners who are using and/or processing Personal Data or Information.

2.2 All employees of the Company are required to adhere to the Privacy Policy and principles when they collect and / or handle Personal Data or Information or are involved in the process of maintaining or disposing of Personal Data or Information. All business partner and/or any third-party working with or for the Company, and who have entered any kind of business relationship with the Company, shall be deemed to have read, understood and complied with this policy and will be required to adhere to this Privacy Policy.

2.3 This Policy shall be effective from 1st November, 2021

3. GRIEVANCE OFFICER

The Company has appointed a Grievance Officer to address and resolve any queries or grievances in connection with the Privacy Policy. The Grievance Officer can be reached in the following ways:

Name: Pawan Jain

Designation: Head Compliance – Lead Legal

Email : pawan.jain@niairport.in

Address: YIAPL Administrative Office, Noida International Airport, Kishore Pur, Jewar, Gautam Buddha Nagar, Uttar Pradesh, 203155,

4. NOTICE

Notice shall be made readily accessible and available to the Providers before or at the time of collection of Personal Data or Information or otherwise, notice shall be provided as soon as practical thereafter. Notice shall be displayed clearly and conspicuously and shall be provided through online (e.g. by posting it on the intranet portal, website, sending mails, newsletters, etc.) and / or offline methods (e.g. through posts, couriers, etc.). All the web sites (including Intranet portals), and any product or service that collects Personal Data or Information internally, shall have a privacy notice.

5. COLLECTION

5.1 The Company shall collect Personal Data or Information from the Providers only for the legitimate purpose including but not limited to deliver its product or services pursuant to the contract entered with the Providers, to run its business more effectively and efficiently and/or to discharge its obligations pursuant to a contract to which the Company is a Party. The Company shall also collect and retain Personal Data or Information to meet any requirement of the applicable statute or to comply with any order, instructions, directions etc. of the judicial, quasi-judicial, local administration, police or any authority duly empowered to collect such Personal Data or Information. Personal Data or Information may be collected online or offline.

5.2 The Company shall review the privacy policies and collection methods of third parties before accepting from, and/or providing, Personal Data or Information to, third parties.

6. USE, RETENTION AND DISPOSAL:

6.1 The Company shall use Personal Data or Information only for the purpose for which it was collected and/or in accordance with the consent submitted by the Providers. The Company shall not retain Personal Data or Information longer than is necessary to fulfil the legitimate purpose for which it was collected, and to maintain reasonable business records in line with legal, regulatory or statutory obligations. The Company shall dispose the Personal Data or Information once it has served its intended legitimate purpose or as specified by the Providers. The Company or any authorized person acting on behalf of the Company has no responsibility for anything whatsoever, direct or indirect, if Personal Data or Information is found to be misleading, false and inaccurate.

6.2 An appropriate method will be placed to ensure that Personal Data or Information is destroyed in a manner sufficient to prevent unauthorized access to that data or information or is de-identified in a manner sufficient to make the data or information non-personally identifiable, should retention of the Personal Data or Information is no longer be required. Personal Information or Data shall be erased if their storage violates any of the data protection rules or if knowledge of the data is no longer required by the Company or for the benefit of the Provider. Additionally, the Company has the right to retain the Personnel Information or Data for legal and regulatory purpose and as per applicable data privacy laws.

7. ACCESS

The Company shall, allow the Providers to make inquiries regarding the Personal Data or Information about them that the Company holds, and when appropriate, provide access to their Personal Data or Information for review, and/or update. The privacy coordinators shall record and document each access request as it is received and the corresponding action taken.

8. DISCLOSURE TO THIRD PARTIES

8.1 The Company may disclose Personal Data or Information to third Parties only for legitimate purposes. The Company shall disclose Personal Data or Information in a secure manner, with assurances of protection by those parties, according to the contracts, laws and other segments. The Company processes Personal Data or Information for the performance of the contracts/agreements concluded with the Providers, in compliance with applicable legal or regulatory obligations or the Company's legitimate interests to provide adequate and qualitative products and services and to prevent against any excessive risk. The Company may also disclose Personal Data or Information to third parties to discharge its legal or contractual obligations. The third parties receiving or processing any Personal Data or Information should have the Privacy Policy containing terms and conditions similar to this Policy or terms and conditions more stringent than that of this Policy.

8.2 Where a third party has engaged, with the prior permission from the Company, another sub-contractor for processing Personal Data or Information on behalf of the Company then such sub-contractor shall be obligated to strictly follow the same terms and conditions as the third party is subject to under this Policy, and if more stringent obligations are laid down in the applicable statute or in the contract then such sub-contractor shall meet those obligations which shall not be less than that of the standards envisaged in this policy.

9. CHOICE AND CONSENT

9.1 Subject to clause no.9.2, the Company may provide an opportunity to the Providers to exercise their choices and consent regarding how it collects, uses, and discloses their Personal Data or Information. The consent may be obtained (in writing or electronically) from the Providers before or at the time of collecting sensitive personal information or as soon as practical thereafter in the format annexed to this Policy as Annexure -1. The consent is dispensed with if the Personal Data or Information is used for fulfilling the Company's statutory obligations.

9.2 The consent can also be gathered or implied from the terms of the principal document governing the relationship between the Company and the Provider for example a purchase contract or the appointment letter may contain a clause and/or by entering a business relationship with the Company as a prospective customer, supplier, employee or business partner it shall be deemed to have accepted the terms of this Privacy Policy, or by entering that the Provider hereby acknowledges that the Company may come in the possession of Personal Data or Information which can be shared with a third party in discharge of its legal obligations or otherwise for its legitimate purpose.

10. SECURITY

10.1 Information security policy and procedures shall be documented and implemented to ensure reasonable security for Personal Data or Information collected, stored, used, and disposed by the Company.

10.2 Information asset labelling and handling guidelines shall include controls specific to the storage, retention and transfer of Personal Data or Information.

10.3 The Company is committed to establish procedures that maintain the logical and physical security of Personal Data or Information. The Company shall establish procedures that ensure protection of Personal Data or Information against accidental disclosure due to natural disasters and environmental hazards.

10.4 Incident response protocols are established and maintained in order to deal with incidents concerning Personal Data or Information or privacy practices.

10.5 Information Technology team shall exercise periodically the review of information security safeguards and in-built mechanism for the collection, use, protection and transfer of Personal Data or Information as envisaged in this policy.

11. QUALITY

11.1 The Company maintains data integrity and quality, as appropriate for the intended purpose of Personal Data or Information collection and use and also ensure that data is reliable, accurate, complete and current. For this purpose, the Human Resource and Information Technology Security team shall have systems and procedures in place to ensure that Personal Data or Information collected is accurate and complete for the legitimate business purposes for which it is to be used.

11.2 The Company performs an annual assessment on the best privacy practices to check for the improvement in the collection, maintenance, access and dissemination of Personal Data or Information.

12. RESOLUTION AND RECOURSE

12.1 Grievance Officer is designated in clause no.3 or any other officer authorized by the Company from time to time and displayed on the Company's website, if any, from time to time. The Grievance Officer shall address the privacy related incidents and breaches. The Company undertakes to perform a periodic review of all the complaints related to Personal Data or Information to ensure that all the complaints are resolved in a timely manner and resolutions are documented and communicated to the complainant.

12.2 Employees with inquiries or complaints about the processing of their Personal Data or Information shall first discuss the matter with their immediate supervisor. If the employee does not wish to raise an inquiry or complaint with an immediate manager, or if the manager and employee are unable to reach a satisfactory resolution of the issues raised, the employee shall bring the issue to the attention of the Grievance Officer.

13. ENFORCEMENT AND COMPLIANCE REVIEW

13.1 Human Resource Team and Information Technology Team are jointly responsible for the compliance and execution of this Privacy Policy with respect to their respective responsibilities. Human Resource Team in collaboration with Information Technology Team shall conduct an internal audit annually (at minimum) to ensure compliance with the established privacy policies and applicable laws, if any. The internal audit may consist of the review of the following:

- i. collection of the Personal Data or Information;

- ii. the purposes for which the Personal Data or Information is collected and processed;
- iii. actual uses of the Personal Data or Information collected;
- iv. disclosures made about the purposes of the collection and use of such Personal Data or Information;
- v. the existence and scope of any consents to the above activities;
- vi. any legal obligations regarding the collection and processing of such Personal Data or Information, and
- vii. the scope, sufficiency, and implementation status of security measures.

13.2 The Grievance Officer is responsible to maintain a document comprising all the instances of non-compliance with privacy policies and procedures. The Grievance Officer shall take actions on the findings from the internal audit and work on the recommendations for improvement in the privacy policy.

14. AMENDMENT

The Company may in its absolute discretion update this policy from time to time. This policy is subject to the applicable law in force, if any.

Annexure – 1

(Refer clause 9.1)

Consent

To

Yamuna International Airport Private Limited (“Company”)

New Delhi

Kind Attention -, HR Head

I,....., s/o.....r/o.....being appointed as.....(Employee ID... ..) on, hereby acknowledge the terms of the Company’s Privacy Policy, and hereby authorize the Company to collect, process, use, retain the Personal Data or Information either on its own and/or transfer to a third party that is necessary or desirable for the legitimate purpose of the Company.

I, confirm that the Personal Data or Information furnished by me is true and accurate, and undertake to inform the Company promptly as and when any changes are occurred in the Personal Data or Information furnished.

Name:..... Sign.....

Date