

## Information Security Guidelines

### MLL Information Security Data Privacy Guidelines

## 1. Purpose

1.1. MLL Limited as a body corporate is required to provide privacy guidelines while handling or dealing in personal information including sensitive personal data or information (As per Information Technology Act 2000 & Information Technology Rules 2011). Privacy of individual is important and critical. MLL always endeavors to ensure that personal information which is collected and stored would always be held, used, transferred and processed in accordance with the applicable legal obligations. Privacy guidelines describes how MLL collects and uses personal data including sensitive personal data or information.

## 2. Scope

2.1. The scope of this guideline is limited to enterprise wise Mobile devices of MLL and applicable to all locations of MLL which are covered under ISMS Scope

## 3. Applicability

- 3.1 This policy is applicable to all Employees, contract workers and vendors of MLL
- 3.2 All concerned locations and employees of MLL, based in India and coming under purview of Information Technology Act 2000 & Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011.
- 3.3 Data / Information collected by Third Party Sites, platforms and/or applications not controlled by MLL Limited. Third Party Sites may have their own privacy policies and terms and conditions which individual may refer to.
- 3.4 Data / Information collected by Third Party Sites\* which individual may access via links on MLL Limited Sites
- 3.5 Banners, Leaflets, Sweepstakes, advertisements or promotions on Third Party Sites that MLL Limited may sponsor or participate in

## 4. Guideline

### **4.1 Information Security Privacy Guidelines (One Page) for Communication:**

4.1.1. We in MLL Limited are committed to protection of privacy of individual in business and professional activities.

4.1.2. While handling and / or dealing with any personal information including sensitive personal data or information, we assure that:

4.2.2.1. We will safeguard personal data and information.

4.2.2.2. We will keep personal data and information complete, accurate and up to date.

4.2.2.3. We will always limit use of personal information to the extent that we reasonably require to deliver our products / services, and also to administer our business.

4.2.2.4. We will permit only the authorized personnel to have the access to personal data and information.

4.2.2.5. Whenever we hire other organizations to provide services, they conform to our privacy guidelines and also allow us to audit for compliance.

4.1.3. We undertake not to divulge any personal information, except where we are required by law to respond to statutory authorities or any Court or legal authority.

### **4.2 Information Privacy Guidelines**

4.2.1 This Privacy guideline helps stakeholders to understand how MLL handle and deal with Personal Information including Sensitive personal Data or Information. The Privacy guidelines above covers the following:

4.2.1.1 Definitions used in this Guidelines

4.2.1.2 Collection of Personal Information

- 4.2.1.3 Use of Personal Information
- 4.2.1.4 Disclosure of Personal Information
- 4.2.1.5 Protection of Personal Information
- 4.2.1.6 Review and updating of Personal Information
- 4.2.1.7 Changes to Privacy Guidelines

### **4.3 Definitions in Privacy Information**

- 4.3.1 “Personal information” means any information that relates to a natural person which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.
- 4.3.2 Sensitive personal data or information of a person” means such personal information which is related to:
  - 4.3.2.1 Password
  - 4.3.2.2 Financial information such as Bank account or credit card or debit card or other payment
  - 4.3.2.3 Financial details
  - 4.3.2.4 Physical, physiological and mental health condition
  - 4.3.2.5 Sexual orientation
  - 4.3.2.6 Medical records and history
  - 4.3.2.7 Biometric information
- 4.3.3 Provided that any information that is freely available or accessible in public domain or furnished under Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.

4.3.4 For the purposes of this guidelines document, a 'Third Party' is a service provider who associates with MLL Limited and is involved in handling, managing, storing, processing, protecting and transmitting information of MLL Limited and also includes all sub-contractors, consultants and/or representatives of the Third party.

#### **4.4 Collection of Personal Information**

4.4.1 All authorized locations and employees of MLL, and authorized third parties may collect various types of Personal Information including Sensitive personal Data or Information as required for business under laws and regulation and based on desire and consent of individual concerned.

4.4.2 This Personal Information including Sensitive personal Data or Information may include but are not limited to:

4.4.2.1 Personal Information: Person's name, age, gender, date of birth, photographs, password etc.

4.4.2.2 Contact Information: Person's address, telephone numbers, e-mail etc.

4.4.2.3 Financial Information: Any detail pertaining to bank account, credit/debit cards, payment instruments, annual income, investment/savings, Income Tax (PAN Card, Form 16 etc.)

4.4.2.4 Health Information: Person's Height, Weight, illness / diseases, Medical Reports etc.

4.4.2.5 Other Information: Any Information used as proof of Identity, proof of address, proof of age, proof of income etc.

4.4.3 In case the individual do not provide his consent for usage of personal information and / or withdraw his consent for usage of personal information, MLL Limited reserves the right to discontinue or cancel its services or engagement for which the said information was sought from the individual.

## 4.5 Use of Personal Information

4.5.1 All Personal Information including Sensitive personal Data or Information is held in accordance with the applicable laws and regulations for use in number of lawful purposes connected with business and professional activities, which may include but are not limited to:

- 4.5.1.1 Verification of identity as per prevalent laws and regulations.
- 4.5.1.2 Processing individual's request and providing individual concerned with products and /or services requested.
- 4.5.1.3 Settling the accounts with those who provide services.
- 4.5.1.4 Dealing with requests, enquiries or complaints and other customer care related activities; and all other general administrative and business purposes.
- 4.5.1.5 Carrying out market and product analysis and marketing our companies' products and services and communicate updates, offers and promotion.
- 4.5.1.6 Customer analytics on usage pattern and deliver customized content and advertising that may be of interest to individual
- 4.5.1.7 Provide individual concerned with best of customer experience
- 4.5.1.8 Address network integrity and security issues
- 4.5.1.9 Carrying out any activity in connection with a legal, governmental or regulatory requirement, for the purpose of compliance of a legal obligation, in connection with legal proceedings, in connection with prevention, detection , investigation including cyber incidents, prosecution, and punishment of offences protect and defend our rights or property or act in an emergency to protect someone's safety or to help investigations, monitor or prevent or take action regarding unlawful and illegal activities, suspected fraud, potential threat to the safety or security of any person.

4.5.1.10 Carrying out activities connected with the running of our business such as personnel training, quality control, network monitoring, testing and maintenance of computer and other systems and in connection with the transfer of any part of our business in respect of which you are a customer or a potential customer;

## **4.6 Disclosure of Personal Information**

4.6.1 Any Personal Information including Sensitive personal Data or Information at times may be disclosed where it is necessary to third parties such as:

4.6.1.1 Other companies that provide services directly to you on our behalf or provide services to us by collecting, receiving, processing, storing, dealing or handling your information. To enable them to do this, we may need to share your personal information and/or Sensitive personal Data or Information with them.

4.6.1.2 Anyone we transfer our business to in respect of which you are a customer or a potential customer.

4.6.1.3 To any other entity or organization in order for them to understand the environment and consequently, provide better services.

4.6.2 MLL may share Personal Information including Sensitive personal Data or Information, without obtaining any prior written consent of individual with government agencies mandated under the law to obtain information including Sensitive Personal Data Or Information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, or where disclosure is necessary for compliance of a legal obligation.

4.6.3 Any Personal Information including Sensitive Personal Data or Information may be required to be disclosed to any third party by us by an order under the law for the time being in force.

## **4.7 Protection of Personal Information**

- 4.7.1 MLL shall take steps to ensure that the personal information including Sensitive personal Data or Information is stored in secure environment protected from unauthorized access, modification or disclosure as long as required for business or otherwise required under the law.

## **4.8 Review and updating of Personal Information**

- 4.8.1 MLL strive to keep personal information always updated with the latest to the extent possible. To this end if individual see any discrepancy or part of personal information changes with time, he is expected and encouraged to inform to get the personal information updated with the latest.


## **4.9 Changes to Privacy Guidelines**

- 4.9.1 MLL reserve the right to update this guidelines as necessary from time to time.

## **5 Exceptions**

- 5.1 Exceptions shall not be universal but shall be agreed on a case-by-case basis, upon official request made by the information owner. These may arise, for example, because of local circumstances, conditions or legal reason existing at any point of time.
- 5.2 Exceptions to the Information Security Policy and Procedures may have to be allowed at the time of implementation of these policies and procedures or at the time of making any updation to this document or after implementation on an adhoc basis based on business or a specific and a peculiar manifestation of circumstances which could be of temporary or permanent in nature.
- 5.3 All exceptions during implementation shall be submitted by the concerned person responsible for implementation. These shall be submitted through an Exception Form and sign-off on the same shall be maintained including ad-hoc requests.





5.4 The ISC shall review all exceptions, as the case may be, every year for validity and continuity.

5.5 MLL shall also list parameters to ensure that before acquiring new applications or other software and hardware, the set of applicable policies and guidelines shall be matched with the available security mechanisms of the product to ensure that the product has the necessary features. If not, then exceptions shall be approved before acquiring the desired product. Similarly, while developing new applications, the necessary security policies and guidelines have to be incorporated in the application or exceptions shall be obtained for the same from the Information Security Team.