

# DATA PRIVACY POLICY

[Indian Information Technology Act, 2000 &  
Digital Personal Data Protection (DPDP) Act, 2023]

## 1. INTRODUCTION

In accordance with all applicable laws, Raminfo Limited (“RIL”), has created this Privacy Policy (hereinafter referred to as “**Privacy Policy**” or “**Policy**” or “**Privacy Statement**”) in order to demonstrate RIL’s privacy commitment to any individual whose data RIL collects, stores or processes for providing or offering its services and products.

## 2. DEFINITIONS

“**Agent**” means any individual or entity which has a contractual relationship with RIL, where RIL is the principal and the other individual or entity is the agent, shall hereinafter be referred to as an “Agent”. For instance, RIL’s distributors, dealers, contractors, etc. shall be considered Agents.

“**Data Subject**” means all individuals whose personal information is either collected, received, processed, stored, dealt or handled by RIL shall hereinafter be referred to as “Data Subject”.

“**Information**” means Personal Information of a Data Subject collected by RIL under this Policy shall hereinafter be referred to as “Information”. Such Information includes, *inter alia*, Sensitive Personal Data or Information as defined under the Indian Information Technology Act, 2000 and the Aadhaar number and/or the biometric information associated with an Aadhaar number.

## 3. GOVERNING LAW

RIL is an organization based and existing in India and is thus bound by the laws of the Republic of India. This Privacy Policy has been prepared in accordance with applicable Indian laws, including the Indian Information Technology Act, 2000 and Digital Personal Data Protection (DPDP) Act, 2023.

## 4. APPLICABILITY

This Policy applies to all individuals whose information is either collected, received, processed, stored, dealt or handled by RIL.

## 5. OBJECTIVE

This Privacy Policy is intended to inform the Data Subject on how RIL collects, processes, stores, and uses personal information that a Data Subject provides to RIL,

This Privacy Policy also covers RIL’s treatment of any personal information that Third Parties share with RIL.

## 6. HOW RIL COLLECTS DATA SUBJECT’S INFORMATION

RIL collects Information about Data Subject through the following means:

- a) whenever a Data Subject shows an interest or elects to use RIL's services or products, irrespective of whether such services/products are provided directly by RIL or by its Agents on RIL's behalf;
- b) through RIL's network of Agents and a Third Party which collects such Information and transfers it to RIL for a business requirement;
- c) when Data Subject visits the website of RIL;
- d) when Data Subject, which also includes employees of RIL, directly elects to share their Information with RIL.

## **7. WHY RIL COLLECTS DATA SUBJECT'S INFORMATION**

RIL uses the Information to conduct its business and to provide Data Subject with the best possible services/products.

RIL will only use the Information based on this Privacy Policy, its understanding with the Data Subject, or as required by law.

RIL will collect adequate, relevant and necessary Information and will process such Information fairly and lawfully for the purpose it is collected.

Most commonly, RIL will use the Information in the following circumstances:

- a) Where RIL needs to perform the obligations it has promised the Data Subject, such as to provide a service or product to the Data Subject and to enable the Data Subject's use of RIL's products/services, including but not limited to dealing with enquiries and complaints made by or about the Data Subject relating to services/products provided by RIL and to improve and customize RIL's services/products in accordance with the Data Subject's preferences;
- b) Where RIL needs to comply with a legal, accounting, business or any reporting obligation;
- c) To send marketing as well as non-marketing commercial communications to the Data Subject;
- d) To send the Data Subject notifications that the Data Subject has specifically requested for as well as to send statements, invoices and payment reminders to the Data Subject, and to collect payments from the Data Subject;
- e) To keep RIL's website and other systems secure and to prevent fraud;
- f) To manage the employment of the data subject with RIL.

RIL collects and processes the Information only when it is essential to offer its services/products to the Data Subject. By providing his or her Information, the Data

Subject agrees that RIL may collect, use and share this Information with Third Parties for the purposes mentioned above.

## **8. FAILURE TO PROVIDE INFORMATION**

RIL may not be able to perform the obligations it has promised the Data Subject, or RIL may be prevented from complying with its legal, accounting, business or reporting obligations, if the Data Subject fails to provide certain Information when requested by RIL. RIL shall not be held liable in any manner whatsoever if RIL is unable to perform its services or if there is a deficiency in RIL's services to the Data Subject due to Data Subject's failure to provide such Information.

RIL and/or its representatives shall be indemnified by the Data Subject and held harmless from any complaints, legal proceedings or claims filed or initiated by the Data Subject or any Third Party against RIL in this regard.

## **9. CHANGE OF PURPOSE**

RIL will only use Data Subject's Information for the purposes for which RIL collected it, unless RIL reasonably considers that it needs to use it for another reason and that reason is compatible with the original purpose.

## **10. CONSENT**

Data Subject agrees that RIL does not need any additional or further consent from him/her to use the Data Subject's Information in accordance with this Policy to carry out RIL's legal obligations or exercise specific rights.

## **11. INFORMATION SHARING AND DISCLOSURE**

RIL may disclose the Information to any of its Agents or Third Parties insofar as reasonably necessary for the purposes set out in this Policy and for the purpose of providing services/products to the Data Subject. Such Agents and Third Parties are expected to provide a similar level of protection to the Information as is adhered to by RIL. In addition to this, RIL may disclose the Information where it is required to do so by law or to statutory authorities.

## **12. TRANSFER OF INFORMATION OUTSIDE INDIA**

Unless stated otherwise, RIL stores and processes the Information in India. There may, however, be occasions when RIL needs to transfer the Information outside India for its business requirements. In such instances, RIL will exercise the same level of care in handling the Information as it does in India.

## **13. DATA SECURITY**

The Information is processed by RIL in strict accordance with the Indian Information Technology Act, 2000 and Digital Personal Data Protection (DPDP) Act, 2023 and the rules notified thereunder. RIL implements and maintain 'Reasonable Security Practices and Procedures' as stated in the Indian Information Technology Act, 2000 and the

Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, while processing, collecting, storing or handling any Information.

#### **14. DATA RETENTION**

RIL will only retain the Information for as long as necessary to fulfil the purposes RIL collected it for, including for the purposes of satisfying any legal, business, accounting, or any reporting requirements.

In some circumstances, RIL may anonymize the Information so that it can no longer be associated with the Data Subject, in which case RIL may use such information without a further reference to Data Subject.

#### **15. WHO HANDLES AND RETAINS DATA SUBJECT'S INFORMATION**

Details about the primary entity which handles and retains the Information is provided below:

*Raminfo Limited*

*Registered office at Unit No. 1609, 16th Floor, Orbit,*

*Plot No. 30C, Sy. No. 83/1, Hyderabad Knowledge City,*

*TSIIC, Madhapur, Hyderabad, Shaikpet, Telangana, India, 500081*

#### **16. REVIEW OF INFORMATION**

Data Subject can contact RIL, through the Grievance Officer whose details are provided at the end of the Policy, requesting access to Data Subject's Information for reviewing or requesting amendment to certain information that Data Subject considers to be incorrect or wrong. RIL shall process such requests from Data Subject in accordance with applicable law.

RIL shall not be responsible for the authenticity of the Information provided by the Data Subject to RIL or its Agents.

#### **17. WITHDRAWAL OF CONSENT**

Data Subject may at any time revoke or withdraw Data Subject's consent to provide Information to RIL by contacting the Grievance Officer whose details are provided at the end of the Policy.

However, such action may render it difficult for RIL to offer some of its services/products to the Data Subject any further.

RIL shall not be held liable in any manner whatsoever if RIL is unable to perform its services or if there is a deficiency in its services to Data Subject due to Data Subject's withdrawal of consent.

RIL and/or its representatives shall be indemnified by the Data Subject and held harmless from any complaints, legal proceedings or claims filed or initiated by the Data Subject or any Third Party against RIL in this regard.

## 18. GRIEVANCE OFFICER

In accordance with the Indian Information Technology Act 2000 and the rules notified thereunder, the contact details of the Grievance Officer are provided below:

**Name:** Mr. K. Kiran Kumar Reddy

**Designation:** Company Secretary

**Raminfo Limited**

Unit No. 1609, 16th Floor, Orbit,

Plot No. 30C, Sy. No. 83/1,

Hyderabad Knowledge City, TSIIC,

Madhapur, Hyderabad, Shaikpet,

Telangana, India, 500081

**Email:** cs@raminfo.com

## 19. AMENDMENT OF THE POLICY

Our Company reserves the right to vary and/or amend the terms of this Policy from time to time.

\*\*\*\*\*

Last reviewed and amended on – 19.05.2025