



Neterwala Group

Data Protection and Privacy Policy

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1. Purpose

The purpose of this Data Protection and Privacy Policy is to ensure that the Neterwala Group handles personal data in a manner that is consistent with applicable legal, regulatory, contractual, and business requirements. This policy aims to protect the privacy of individuals and safeguard personal information against unauthorized access, use, disclosure, modification, or destruction.

2. Scope

This policy applies to all employees, contractors, consultants, and third parties who process personal data on behalf of the Neterwala Group.

It applies to personal data relating to:

- Employees.
- Customers.
- Suppliers.
- Business partners.
- Visitors.
- Other individuals whose information is processed by the organization.

3. Definitions

Personal Data

Any information relating to an identified or identifiable individual.

Examples include:

- Names.
- Addresses.
- Email addresses.
- Phone numbers.
- Identification numbers.
- Employment records.

Processing

Any activity involving personal data including collection, storage, use, modification, transmission, or deletion.

Data Subject

An individual whose personal data is being processed.

Data Controller

The entity determining the purposes and means of processing personal data.

Data Processor

An entity processing personal data on behalf of the Data Controller.

4. Data Protection Principles

The Neterwala Group is committed to the following principles.

4.1 Lawfulness, Fairness, and Transparency

Lawfulness

Personal data shall be processed in accordance with applicable laws and business requirements.

Fairness

Processing activities shall be conducted fairly and without misleading individuals.

Transparency

Individuals shall be informed regarding the collection and use of their personal information where required.

4.2 Purpose Limitation

Specific Purposes

Personal data shall be collected for legitimate business purposes.

Purpose Limitation

Personal data shall not be used for purposes inconsistent with those for which it was collected.

4.3 Data Minimization

Relevant Data

Only information necessary for the intended purpose shall be collected and processed.

Adequate Data

Collection of excessive personal information shall be avoided.

4.4 Accuracy

Up-to-Date

Reasonable efforts shall be made to maintain accurate and current information.

4.5 Storage Limitation

Retention Period

Personal information shall be retained according to business and legal requirements.

Deletion

Information that is no longer required shall be securely deleted or disposed of in accordance with the Data Disposal Policy and Data Deletion and Retention Policy.

4.6 Integrity and Confidentiality

Security Measures

Appropriate technical and organizational controls shall be implemented to protect personal data.

Confidentiality

Access to personal information shall be restricted to authorized personnel with a legitimate business need.

5. Data Collection and Use

5.1 Data Collection

Methods

Personal information shall be collected through lawful and legitimate means.

Consent

Consent shall be obtained where required by applicable laws or contractual obligations.

5.2 Data Use

Purpose

Personal information shall be used only for legitimate business purposes.

Processing

Processing activities shall be consistent with the principles defined in this policy.

6. Data Subject Rights

Where required by applicable laws and regulations, individuals may exercise rights relating to their personal information.

6.1 Right to Access

Individuals may request information regarding personal data held by the organization.

6.2 Right to Rectification

Individuals may request correction of inaccurate or incomplete information.

6.3 Right to Erasure

Requests for deletion of personal information shall be evaluated in accordance with legal and business requirements.

6.4 Right to Restriction

Processing may be restricted where required by applicable laws.

6.5 Right to Data Portability

Requests for transfer of personal information shall be evaluated where legally applicable.

6.6 Right to Object

Individuals may object to certain processing activities where permitted by law.

6.7 Rights Related to Automated Decision-Making

The organization does not intentionally rely on automated decision-making processes that significantly affect individuals without appropriate controls.

7. Data Security

7.1 Security Measures

Protection

Technical and organizational controls shall be implemented to protect personal information.

Encryption

Encryption and secure communication methods shall be utilized where appropriate and supported.

7.2 Incident Response

Breach Notification

Security incidents involving personal information shall be managed in accordance with the Incident Management Policy.

Notifications shall be performed in accordance with applicable legal and regulatory requirements.

8. Data Processing and Third Parties

8.1 Third-Party Processors

Due Diligence

Third parties processing personal information shall be evaluated through supplier management processes.

Agreements

Contracts and agreements shall include appropriate information security and confidentiality requirements.

8.2 International Transfers

Compliance

Transfers of personal information across jurisdictions shall comply with applicable legal and contractual requirements.

9. Training and Awareness

9.1 Employee Training

Programs

Personnel shall receive awareness and training regarding privacy and information protection requirements.

9.2 Awareness

Updates

Employees shall be informed of significant changes to privacy requirements and related policies.

10. Policy Review and Updates

This policy shall be reviewed annually or whenever significant changes occur to legal requirements, business operations, or information security practices.

Changes shall be approved by management and communicated to relevant stakeholders.

11. Contact Information

For questions or concerns regarding this Data Protection and Privacy Policy, please contact:

Data Protection Officer (DPO):

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