

Data Protection Policy

Garnet Global Consultants LLP

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Definitions

Organisation	means Garnet Global Consultants LLP, a company registered under section 12(1) of the Limited Liability Partnership Act, 2008 with LLP Identification number AAY-4061.
Regulatory Authorities	means the Information Technology Act, 2000 (IT Act) and Indian Contract Act, 1872 which implements the General Data Protection Regulation in India
Responsible Person	Ms. Himanshu Goyal, Chief Operating and Information Officer.
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Organisation.

1. Data protection principles

The Organisation is committed to processing data in accordance with its responsibilities under the Regulatory Authorities

Regulatory Authorities requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the regulatory authorities in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General provisions

- a. This policy applies to all personal data processed by the Organisation.
- b. The Responsible Person takes responsibility for the Organisation's ongoing compliance with this policy.
- c. This policy is reviewed annually.
- d. The Organisation is registered with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Organisation maintains a Register of Systems.
- b. The Register of Systems is reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Organisation is dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the Organisation is done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. The Organisation notes the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent is kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent is clearly available and systems are in place to ensure such revocation is reflected accurately in the Organisation's systems.

5. Data minimisation

- a. The Organisation ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The Organisation takes reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps are put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Organisation has put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. Our archiving policy consider what data should/must be retained, for how long, and why.

8. Security

- a. The Organisation ensures that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this is done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions are in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Organisation promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the relevant Regulatory Authorities.

END OF POLICY