

## External Privacy Policy

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## External Privacy Policy

### INTRODUCTION

Neosym Industry Limited is a leading grey and SG iron castings manufacturing company that is serving the automotive, agriculture, earthmoving, engineering & railways for over 50 years. The company supplies raw casting and fully machined components to customers in several countries. The company has its registered office at **Industry House, 1st Floor, Backbay Reclamation, Churchgate, Mumbai, India** herein after referred to as “We” or “Us” or “Company” or “NEOSYM”

This website [www.neosym.com](http://www.neosym.com) is designed to provide access to information about NEOSYM and our products. By using this site and connected online forums accessible from this site and / or maintained by NEOSYM, you agree to the use of information about you, including personally identifiable information which may be collected, used and disseminated for the provision of our products and services to you.

The NEOSYM privacy policy is designed to share with you, the user, details of why and how our website gathers and uses information about and from you. We understand that you expect privacy and security, and the need to safeguard sensitive information about you, NEOSYM is committed to following policies that comply with current international personal data protection laws and regulations.

We hereby request individuals who qualify as data subjects under the EU General Data Protection Regulation to read this statement, together with any privacy statement we may provide on specific occasions when we are collecting or processing personal data about them, so that they are aware about the processing of their personal data throughout its lifecycle.

### GOVERNING LAW

This policy contains specific provisions in accordance with the General Data Protection Regulation of European Union. These provisions apply only to those individuals that qualify as data subjects for the purposes of the Regulation.

### APPLICABILITY

This Policy applies to the personal data of all vendors, visitors, existing and prospective customers, existing and prospective employees and other individuals who provide their personal data to the Company and all such individuals are hereinafter referred to as “Data Subject”.

### OBJECTIVE

This Privacy Policy, as mentioned above, is intended to inform you on how we gather, define, and use Personal Data that you provide to the Company when using our websites and social media platforms or when relying on our services. This Privacy Policy will primarily help you understand:

- (a) The nature of personal data we collect from you
- (b) The sources from where your personal data is collected (In cases where personal data is not directly collected from you)
- (c) The manner in which your personal data is collected
- (d) The purpose of collecting your personal data
- (e) The manner in which your personal data is stored, used and processed

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- (f) The rights that can be exercised by you
- (g) The process to contact the Company for any issues regarding the collection or use of your personal data or to exercise the above mentioned rights of the data subject.

### CATEGORY OF INFORMATION COLLECTED AND USED

Data collected by the Company primarily consists of:

#### (A) Personal Data

The below personal data elements may be collected from you:

- a. Name
- b. Phone number/mobile number
- c. Email id
- d. Country
- e. Address
- f. City
- g. State
- h. Position/Designation
- i. Experience
- j. IP Address
- k. Cookie Data
- l. Social media handles
- m. Organization/Company

#### (B) Sensitive Personal Data

We do not collect sensitive personal data via website. In case, sensitive personal data is required to provide services, we will obtain consent or provide notification to data subject before collection.

#### (C) Cookies

We may obtain information about your usage of our site by using a cookie file which is stored on your browser or on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. Some of the cookies we use are essential for the site to operate. If you continue to use our site, you agree to our use of cookies.

When visitors come to our site, third parties may place cookies on visitors' browsers for targeted advertising purposes. You may avoid that by utilizing ad blocker on your browser. Or to opt out of receiving targeted advertising, click here [www.aboutads.info](http://www.aboutads.info)

The types of data collected will include IP addresses, cookie identifiers, website activity and in the cases where customer fills out a form, it will include all field information filled out by the customer.

For more details, please contact us- [dataprivacy@neosym.com](mailto:dataprivacy@neosym.com)

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### HOW WE COLLECT YOUR DATA

We collect information about you through the following means:

- a. Cookies
- b. Data provided by visitors on website / online forms
- c. Social media handles

### WHY WE COLLECT YOUR DATA (PURPOSE OF PROCESSING)

We use your data to conduct our business and to provide you with the best possible services. Most commonly, we will use your information in the following circumstances:

We collect personal data provided to us for the following purposes-

- **Applying for a job at NEOSYM :**

Identification and administrative data such as the applicant's identity, date and place of birth, gender, address of residence, personal phone number and email address, history of past professional experiences and, as the case may be national identity cards, residence permit or any other necessary authorization for the recruitment of an applicant of foreign nationality, financial details (such as bank and insurance details etc.) for payroll processing which may be procured during onboarding process.

- **Performance of a Contract:**

We may collect personal data such as name, age, parent's name, residential and commercial address, contact number, email ID, country of operation and signatures to perform and execute a contract NEOSYM enters with its customers, employees, vendors and affiliates.

- **Legitimate Business Interests:**

We may collect personal data to provide goods and services to our customers. The personal data elements captured range from name, residential/commercial address, email ID, contact number to financial details. Data is shared with third parties only if it is necessary to deliver respective services and goods.

- **Miscellaneous:**

- i. Where we need to comply with legal obligations such as taxation or instances of legal proceedings;
- ii. To send statements, invoices and payment reminders and to collect payments;
- iii. To send non-marketing commercial communications;
- iv. To send email notifications that have been specifically requested for;
- v. To send marketing communications relating to our business or the businesses of carefully selected third parties, for which recipients have provided their consent. However, NEOSYM can be informed at any time if a recipient of such communications no longer requires such marketing communications
- vi. To deal with enquiries and complaints made;
- vii. To update NEOSYM's website, mobile application and other systems and for its security and fraud prevention

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### CHANGE OF PURPOSE

We will only use your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your information for an unrelated purpose, we will notify you and we will explain the legal basis which allows **NEOSYM** to do so.

Please note that we may process your information without knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### USE OF SERVICES BY MINORS

Currently, NEOSYM doesn't process personal data related to minors for the purposes of General Data Protection Regulation. Any change in the current process shall be adequately communicated to you.

### INFORMATION SHARING AND DISCLOSURE

We may disclose your personal data to any of our employees, officers, insurers, professional advisers, agents, partners, suppliers or subcontractors in so far as reasonably necessary for the purposes set out in this policy and for the purpose of providing services to you.

We may disclose your personal data to any member of our company, including our subsidiaries and partners, insofar as reasonably necessary for the purposes set out in this policy.

Except as provided in this policy, we will not provide your personal data to any other third party.

### AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We do not envisage that any decisions will be taken about you using automated means. However, we will notify you in writing if this position changes.

### DATA SECURITY

All information you provide to us will be secured using strict procedures and security features to try to prevent accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed by us. We have implemented organizational and technical controls to ensure the protection of your personal data processed by us which include but are not limited to the following:

- Access control policy and procedures in place (defined and documented policy, role based access control, segregation of access control roles, etc.)
- Asset management
- Change management
- Business continuity

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- Password Management
- Two factor authentication
- Logging and monitoring
- Network and communication security
- Backup and Restoration
- Physical and Environmental Security

### DATA RETENTION

We will only retain your data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Your data will be stored in our secure servers. We will destroy the personal data in a secure manner post retention period as per our internal data retention and destruction policy.

### YOUR RIGHTS

Natural persons have a right to:

- (i) Request access to, correction and/or erasure of their personal data;
- (ii) Object to processing of their personal data;
- (iii) restrict processing of their personal data; and
- (iv) Request a copy of their personal data, or have a copy thereof sent to another controller, in a structured, commonly used and machine readable format under the right of data portability. These rights may be exercised by contacting [dataprivacy@neosym.com](mailto:dataprivacy@neosym.com)

For your protection, we may only implement requests with respect to the Personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. The Company will act on all data subject requests received without undue delay and respond within one month (30 days) of receipt, post completion of necessary verification checks.

Please note that we may need to retain certain personal data for recordkeeping purposes and/or to complete any undertaking that you began prior to requesting a change or deletion. There may also be residual information which may be subject to a legal hold or subject to certain sectoral or regulatory retention requirements that will remain within our databases and other records, which will not be removed.

**Please note** that if you opt-out of receiving direct marketing from us, we may still send you important administrative messages via email, such as invoicing and payment details, current status of dispatch or delivery of purchased products, etc. from which you cannot opt out (unless an applicable retention schedule or right to erasure request requires deletion of such email address).

**Withdraw consent:** If you withdraw your consent for the use or disclosure of your personal data for purposes set out in this Privacy Notice, you may not have access to all our Services and we might not be able to provide you all of the Services and customer support offered to our users and authorized under this Privacy Notice. We will continue to send updates to you

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about any existing orders or enquiries for purchase of products or services that you have made from us in the past.

### CHANGES TO THIS PRIVACY POLICY

- The policy is subject to modification from time to time. If we decide to change our policy, we will post those changes here with date of change and version history so that you will always know what personal data we gather, how we might use that personal data and whether we will disclose it to anyone.
- We may also notify you in other ways such as email from time to time about changes or modifications to our privacy policy.

### QUESTIONS, COMMENTS AND INFORMATION

For any additional queries related to processing of personal data or reporting of an incident/breach etc. please send an email to: [dataprivacy@neosym.com](mailto:dataprivacy@neosym.com).