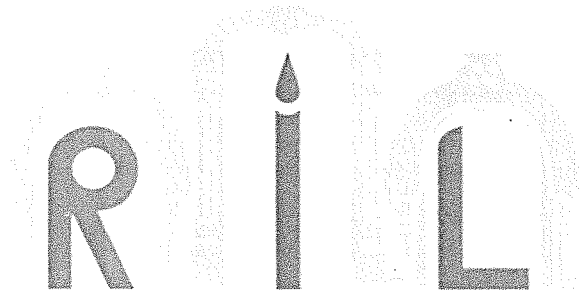




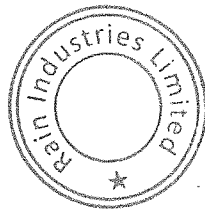
Rain Industries Limited

Data Privacy Policy



RAIN INDUSTRIES LIMITED

Data Privacy Policy





RAIN INDUSTRIES LIMITED

CIN : L26942TG1974PLC001693

Regd. Office: Rain Center, 34, Srinagar Colony, Hyderabad – 500 073, Telangana State, India.

Tel: +91 40 4040 1234, Fax: +91 40 4040 1214, Website: www.Rain-industries.com

Email: secretarial@Rain-industries.com

Data Privacy Policy

A. Objective

The Objective of this Data Privacy Policy defines requirements to help ensure compliance with laws and regulations applicable to Rain Industries Limited (hereafter referred to as “**Rain**” or “**Organization**”) collection, storage, use, transmission, disclosure to third parties and retention of Personal and sensitive personal data.

B. Scope

This Policy applies to all processing of personal data either in electronic form or where it is held in manual files that are structured in a way that allows ready access to information about individuals. Wherever the context requires in this Policy, personal data shall be interpreted to also include sensitive personal data.

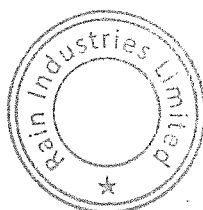
This policy has been designed to establish a worldwide baseline standard for the processing and protection of personal data by all Rain entities.

C. Responsibility

The Data protection officer will be responsible for implementing and executing the procedures and guidelines mentioned in this document and will be reviewed by the CIO.

The information security organization structure at Rain shall consist of:

- Executive Vice President & Chair of the IT Committee (hereafter referred to as “**ITC**”)
- Members of ITC
- Chief Information Office
- Head – Information & Cyber Security
- Information Security/Cybersecurity team
- Global Internal Audit





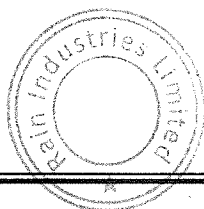
D. Policy statement

1. Management

- A Data Privacy Policy shall be developed and maintained to document the privacy principles and practices followed by Rain.
- A privacy organization shall be defined for governance of data privacy initiatives.
- A Data Protection officer shall be appointed to process complaints and requests for information related to Rain privacy practices.
- Establish procedures for the identification and classification of personal information.
- The Privacy Policy statement shall be made available on the internal portal.
- The Data Privacy Policy shall be communicated to the internal personnel.
- Procedures shall be established for disciplinary and remedial action for violations of the Data Privacy Policy.
- Changes or updates to the Data Privacy Policy shall be communicated to all internal personnel when the changes become effective.
- Establish procedures for performing mandatory registration with regulatory bodies.
- Risk Assessment is to be carried out on a periodic basis to ensure risks to personal information are identified and mitigated.
- The potential impact on data privacy is assessed when new processes involving personal information are implemented, or when significant changes are made to such processes.

2. Notice

- Appropriate notice shall be provided to data subjects at the time personal information is collected.
- The privacy notice or policies and other statements to which they are linked shall provide as full information as is reasonable in the circumstances to inform an individual how their personal information will be used so that the use is fair and lawful. The following information should be considered for inclusion in a notice:
 - Purposes for which personal information is collected, used, and disclosed.
 - Choices available to the individual regarding collection, use and disclosure of personal information, wherever applicable.





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- Period for which personal information shall be retained as per identified business purpose or as mandated by regulations, whichever is later.
 - That personal information shall only be collected for the identified purposes.
 - Methods employed for collection of personal information, including 'cookies and other tracking techniques, and third-party agencies.
 - That an individual's personal information shall be disclosed to Third Parties only for identified lawful business purposes and with the consent of the individual, wherever possible.
 - That an individual's personal information may be transferred within the entities, globally as per requirement, for business purposes with adequate security measures required by law or as per guidance of provided by industry leading practices.
 - Consequences of withholding or withdrawing consent to the collection, use and disclosure of personal information for identified purposes.
 - Data subjects are responsible for providing Rain with accurate and complete personal information, and for contacting the entity if correction of such information is required.
 - Process for an individual to view and update their personal information records.
 - Process for an individual to register a complaint or grievance regarding privacy practices.
 - Contact information of person in charge of privacy practices and responsible for privacy concerns with address at Rain.
 - Process for an individual to withdraw consent for the collection, use and disclosure of their personal information for identified purposes; and
 - That implicit or explicit consent is required to collect, use, and disclose personal information, unless a law or regulation specifically requires or allows otherwise.
- Data subjects shall be provided a Privacy Notice in case any new purpose is identified for using or disclosing personal information before such information is used for purposes not previously identified.

3. Choice and Consent

- Implicit or explicit consent shall be obtained from data subjects at the time of collection of personal information or as soon as practical thereafter.



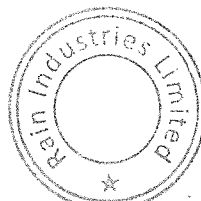
- Explicit consent shall be obtained from data subjects for the collection, use and disclosure of sensitive personal information, unless a law or regulation specifically requires or allows otherwise. A record is maintained of explicit consent obtained from data subjects.
- Implicit consent shall be considered adequate for the collection, use and disclosure of personal information which does not qualify as sensitive personal information.
- Consent shall be obtained from data subjects before their personal information is used for purposes not previously identified.
- Appropriate consent shall be obtained from data subjects before their personal information is transferred to or from their information processing systems.

4. Collection of Personal Information

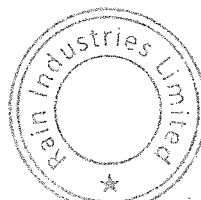
- The collection of personal information shall be limited to the minimum requirement for lawful business purposes.
- Methods of collecting personal information shall be reviewed by management to ensure that personal information is obtained:
 - Fairly, without intimidation or deception, and
 - Lawfully, adhering to laws and regulations relating to the collection of personal information.
- Management shall confirm that Third Parties from whom personal information is collected:
 - Use fair and lawful information collection methods, and
 - Comply with the Data Privacy Policy and their contractual obligations with respect to the collection, use and transfer of personal information.
- Data subjects shall be notified if additional information is developed or acquired about them.

5. Limiting Use, Disclosure and Retention

- Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.
- Personal information retention shall be only for the duration necessary to fulfil the identified lawful business purposes or as prescribed by law.
- Guidelines and procedures shall be developed for the retention and disposal of personal information. These shall address minimum and maximum retention periods, and modes of storage.



- Upon the expiration of identified lawful business purposes or withdrawal of consent, Rain shall either securely erase or anonymize the data subjects' personal information. Data is anonymized to prevent unique identification of an individual.
- 6. Access for Review and Update**
- Processes shall be established for data subjects to:
 - Request access to their personal data or information as prescribed by law.
 - Correct or update their personal data or information; and
 - Withdraw consent for the collection, use and disclosure of their personal information.
 - The identity of data subjects requesting access their personal information, or the identity of the data subjects authorized by the data subject to access the data subject's information, shall be verified before providing access to such information.
 - A response shall be given to data subjects requesting access to their personal information in an accessible form, within a defined period from receipt of complaint/ request as prescribed by law.
 - Data subjects shall be notified, in writing, of the reason for any denial of requests for access to personal information to the extent required by applicable law.
- 7. Disclosure to Third Parties and Outward Transfers**
- Personal information shall be disclosed to third parties only for identified lawful business purposes and after obtaining appropriate consent from the data subjects unless a law or regulation allows or requires otherwise.
 - Where possible, management shall ensure that third parties collecting, storing, or processing personal information have:
 - Signed agreements to protect personal information consistent with the Data Privacy Policy and information security practices or implemented measures as prescribed by law.
 - Signed non-disclosure agreements or confidentiality agreements which includes privacy clauses in the contract; and
 - Established procedures to meet the terms of their agreement with Rain to protect personal information.
 - Personal information may be transferred across geographies from where Rain operates for storage or processing where any of the following apply:





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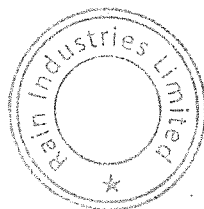
- The individual has given consent to the transfer of information.
 - The transfer is necessary for the performance of a contract between the individual and Rain, or the implementation of pre-contractual measures taken in response to the individual's request.
 - The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between Rain and a third party.
 - The transfer is necessary or legally required on important public interest grounds or for the establishment, exercise, or defence of legal claims.
 - The transfer is required by law.
 - The transfer is necessary to protect the vital interests of the individual.
 - The transfer is made under a data transfer agreement.
 - The transfer is otherwise legitimised by applicable law.
- Remedial action shall be taken in response to misuse or unauthorized disclosure of personal information by a third party collecting, storing, or processing personal information on behalf of Rain.

8. Security Practices for Privacy

- The information security policy and procedures shall be documented and implemented to ensure reasonable security for personal information collected, stored, used, transferred, and disposed by Rain.
- Information asset labelling and handling guidelines shall include controls specific to the storage, retention, and transfer of personal information.
- Management shall establish procedures that maintain the logical and physical security of personal information.
- Management shall establish procedures that ensure protection of personal information against accidental disclosure due to natural disasters and environmental hazards.
- Incident response protocols are established and maintained to deal with incidents concerning personal data or privacy practices.

9. Quality of Personal Information

- Rain may perform additional validation procedures to ensure that personal information collected is accurate and complete for the business purposes for which it is to be used.



- Rain shall ensure that personal information collected is relevant to the business purposes for which it is to be used.

10. Privacy Monitoring and Enforcement

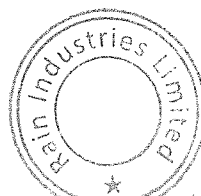
- Procedures shall be established for recording and responding to complaints/ grievances registered by data subjects.
- Each complaint regarding privacy practices registered by data subjects shall be validated, responses documented and communicated to the individual.
- Annual privacy compliance review shall be performed for identified business processes and their supporting applications.
- A record shall be maintained of non-compliances identified in the annual privacy reviews. Corrective and disciplinary measures shall be initiated and tracked to closure, guided by Rain management.
- Procedures shall be established to monitor the effectiveness of controls for personal information and for ensuring corrective actions, as required.
- Any conflicts or disagreements relating to the requirements under this policy or associated privacy practices shall be referred to the Data Privacy Officer for resolution.

11. Retention of records

- Rain has a statutory duty to keep certain records for a minimum period. In other cases, Rain shall not keep personal information for longer than is necessary or as may be required by applicable law.

12. Monitoring

- Monitoring of the systems
- Rain's IT and communications systems are intended to promote effective communication and working practices within our organisation.
- Monitoring is only carried out if and to the extent permitted or as required by law and as necessary and justifiable for business purposes. The resulting log files may be used so that instances of attempted misuse and other security events can be detected, and that information is available to support any subsequent investigation. To the extent permitted by law and, where breaches of this and other policies or applicable law are found, action may be taken under the disciplinary procedure.
- The employees are informed that the telephone system used by the Company allows identification of all dialled numbers and received calls.

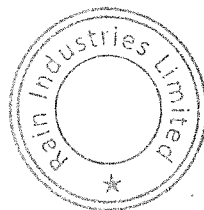


- Rain reserves the right to retrieve the contents of messages, check searches which have been made on the internet, require the immediate return of devices supplied by Rain and access data stored on such devices for the following purposes (this list is not exhaustive):
 - to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this policy (and employees acknowledge that the Company can use software to monitor the identity of senders and receivers of emails).
 - to find lost messages or to retrieve messages lost due to computer failure.
 - to assist in the investigation of wrongful acts; or
 - to comply with any legal obligation.
- If evidence of misuse of Rain's IT systems is found, Rain may undertake a more detailed investigation in accordance with the disciplinary procedures, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the disciplinary procedure. If necessary, such information may be handed to the police in connection with a criminal investigation. Investigations and disclosure of information to the relevant authorities shall be carried out only to the extent permitted by law.

Appendix A: Privacy Principles

The Data Privacy Policy aligns with Generally Accepted Privacy Principles. In view of the changing legislative and technological environment for data privacy, the Data Privacy Policy will undergo revisions. The guiding privacy principles articulated in this policy document are as follows:

- Management: Define, document, communicate, and assign accountability for Data Privacy policy and procedures
- Notice: Provide notice about Data Privacy policy and procedures and identify the purposes for which personal information is collected, used, retained, and disclosed
- Choice and Consent: Describe the choices available to the individual and obtain implicit or explicit consent with respect to the collection, use, and disclosure of personal information.
- Collection of personal information: Collect personal information only for the purposes identified in the notice.
- Limiting Use, Disclosure and Retention: Limit the use, storage and retention of personal information is limited to the purposes identified in the data privacy notice and for which the individual has provided implicit or explicit consent. Retain personal information for only if necessary to fulfill the stated purposes or as required by law or regulations and thereafter appropriately dispose of such information.





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- Access for review and update: Provide data subjects with access to their personal information for review and update.
- Disclosure to third parties: Disclose personal information to third parties only for the purposes identified in the notice and with the implicit or explicit consent of the individual.
- Security practices for privacy: Protect personal information against unauthorized access (both physical and logical)
- Quality of personal information: Maintain accurate, complete, and relevant personal information for the purposes identified in the notice.
- Monitoring and enforcement: Monitor compliance with Data Privacy policy and procedures and have procedures to address privacy related complaints and disputes.

E. Enforcement

Necessary disciplinary action will be taken based on the severity of the incident, it will deal case to case in coordination with HR Team and respective Department Head. Implementation of the policy will be verified during the internal audits and Management review meetings.

F. Confidentiality

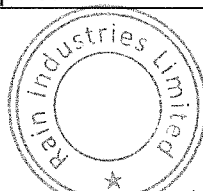
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G. Disclaimer

This document is confidential and is solely for the information of Rain and must not be used, circulated, quoted, or otherwise referred to for any other purpose, nor included or referred to in whole or in part in any document without Rain's prior written consent.

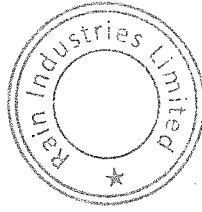
H. Definitions/Abbreviations

Term	Definition
Anonymize	To process a collection of personal data or information such that a natural person cannot be identified based on the output collection of data or information
Data subject	A living individual about whom personal information is processed by
Information security	Preservation of confidentiality, integrity, and availability of information; in addition, other properties, such as authenticity, accountability, non-repudiation, and reliability can also be involved.
Personal Data or personal information	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, can identify such person



<p>Sensitive personal data or sensitive personal information</p>	<p>Sensitive personal data or information of a person means such personal information which consists of information relating to information collected, received, stored, transmitted, or processed by consisting of:</p> <ol style="list-style-type: none"> 1. Password. 2. User details as provided at the time of registration or thereafter. 3. Financial information such as Bank account or credit card or debit card or other payment instrument details. 4. Call data records. 5. Physical, physiological, and mental health condition. 6. Sexual orientation. 7. Medical records and history. 8. Biometric information. 9. any detail relating to the above clauses as provided to body corporate for providing service; and 10. Any of the information received under above clauses for processing, stored or processed under lawful contract or otherwise.
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By Order of the Board
for **Rain Industries Limited**



N. Radhakrishna Reddy
Managing Director
DIN: 00021052

Place: Hyderabad
Date: August 06, 2024