

## Data Privacy Policy

### 1.1. Objective:

The purpose of this policy is to maintain the privacy of and protect the personal information of employees, contractors, vendors, interns, associates, customers and business partners of GS Advisors Pvt. Ltd. and ensure compliance with laws and regulations applicable to GS Advisors Pvt. Ltd. (hereafter referred to as “GROWTHSOURCE” or “the organization”).

### 1.2. Scope:

This policy is applicable to all GROWTHSOURCE employees, contractors, vendors, interns, associates, customers and business partners who may receive personal information, have access to personal information collected or processed, or who provide information to the organization. No Third Party may access personal information held by the organization without having first entered into a confidentiality agreement.

### 1.3. Responsibilities:

The owner for the Data Privacy Policy shall be the Company Directors. The Director shall be responsible for maintenance and accuracy of this policy. The data privacy policy shall be updated in-line with any changes to the prevailing law.

### 1.4. Data Privacy Principles:

This Policy describes generally acceptable privacy principles (GAPP) for the protection and appropriate use of personal information at GROWTHSOURCE. These principles shall govern the use, collection, disposal and transfer of personal information, except as specifically provided by this Policy or as required by applicable laws:

- Choice and Consent: GROWTHSOURCE shall give data subjects the choices and obtain their consent regarding how it collects, uses, and discloses their personal information.

- Rights of Data subject: GROWTHSOURCE shall provide individuals with the right to control their personal information, which includes the right to access, modify, erase, restrict, transmit, or object to certain uses of their information and for withdrawal of earlier given consent to the notice.

- Use, Retention and Disposal: GROWTHSOURCE shall only collect and use personal information that has been collected for the purposes identified in the SoW /employment/contract agreements and in accordance with the consent that the data subject shall provide. GROWTHSOURCE shall not retain personal information longer than is necessary to fulfil the purposes for which it was collected and to maintain reasonable business records. GROWTHSOURCE shall dispose the personal information once it has served its intended

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purpose or as specified by the data subject. GROWTHSOURCE has the right to retain the personnel information for legal and regulatory purpose and as per applicable data privacy laws.

- **Disclosure to Third Parties:** GROWTHSOURCE shall disclose personal information to Third Parties / partner firms only for purposes identified in the SoW / employment/contract agreements. GROWTHSOURCE shall disclose personal information in a secure manner, with assurances of protection by those parties, according to the contracts, laws and other segments, and, where needed, with consent of the data subject. The Third Parties shall sign a NDA (Non-Disclosure Agreement) with GROWTHSOURCE before any personal information is disclosed to the Third Parties partner firms.

- **Security for Privacy:** GROWTHSOURCE shall protect personal information from unauthorized access, data leakage and misuse.

### **1.5 Dispute Resolution and Escalation Process:**

Employees with inquiries or complaints about the processing of their personal information shall first discuss the matter with their immediate supervisor.

Customer / Third Party Customers / Third Party with inquiries or complaints about the processing of their personal information shall bring the matter to the attention of the Director in writing.

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