



PRIVACY POLICY

Sanghvi Movers Limited, together with its direct and indirect subsidiaries and foreign branch offices (“**SML**”, “**We**”, “**Us**”, or “**Our**”), respects your privacy and are committed to protecting it. This Privacy Policy (“Privacy Policy”) explains how We may collect, use, store, disclose or otherwise process your personal data when using our websites or through any other means that We may employ to process your personal data.

We are committed to providing the highest level of protection regarding the Processing of our employees’, vendors’ and clients’/customers’ personal data based on applicable data protection laws and regulations.

This Privacy Policy applies to all current and former users (collectively “You” or “Your”) accessing or using our website, or otherwise engaging with us through email or other means including employees, vendors, clients, consultants etc. By accessing or using our website or by otherwise giving us your information, You confirm that you have read and understood and agreed to the practices outlined in this Privacy Policy.

1. CONSENT ACKNOWLEDGEMENT

By providing Personal Data to SML, whether through employment activities, recruitment processes, vendor/customer onboarding, accessing or using SML’s websites, mobile applications, platforms, portals, or digital tools, or through any direct or indirect interaction, the You acknowledge that You have read, understood, and agreed to this Privacy Policy.

Where required by applicable laws, SML shall obtain explicit, written, electronic, or verifiable consent prior to processing Personal Data, including Sensitive Personal Data such as biometrics and geo-location. Such consent shall be free, specific, informed, and unambiguous.

Continued use of SML’s websites, applications, systems, or ongoing provision of Personal Data shall constitute implied consent only where legally permissible.

Individuals may withdraw consent at any time in accordance with Section 7.

2. PRIVACY PRINCIPLES

SML will handle Personal Data in accordance with the following principles.

3. SCOPE AND APPLICABILITY

This Policy applies to all Personal Data processed by SML, regardless of the format (electronic, physical, audio-visual, or otherwise), source, method of collection, or location of processing.

All employees, contractors, third-party processors, service providers, and partners who access or process Personal Data on behalf of SML must adhere to this Policy.

4. LAWFUL BASIS OF PROCESSING

SML processes Personal Data based on one or more lawful bases:

- Your Consent.
- Performance of employment, contractual, or service obligations.
- Compliance with statutory, regulatory, audit, tax, labour, immigration, or governmental obligations.
- Legitimate business interests.
- Vital interest protection.
- Public-interest tasks where applicable

All processing activities shall be documented and reviewed by the VP-IT

5. TYPES AND SOURCES OF PERSONAL DATA

SML may collect and process the following categories:

(a) Identity & Contact Data

Names, addresses, phone numbers, email IDs, government IDs (PAN, Passport, Visa, Iqama, Aadhaar*).

*Aadhaar collected strictly in compliance with Indian laws.

(b) Employment & HR Data

Recruitment information, payroll, benefits, appraisal data, shift records, training data, emergency contacts etc.

(c) Biometric Data (Integrated)

Collected through:

- SML attendance apps
- Device-based check-in/check-out systems
- Project-site-specific digital tools

Used solely for attendance verification, workforce management, safety, compliance, and fraud prevention.

(d) Financial & Commercial Data

Bank details, invoices, payment history, cancelled cheques, credit notes, debit notes, PAN, GST/VAT numbers and any other necessary information.

(e) Technical / Digital Interaction Data

Cookies, IP address, device metadata, login logs, browser data, access logs.

(f) Operational/Project Data

Site access logs, safety records, equipment-linked data, on-site analytics.

Data may be collected directly from individuals, automatically through digital platforms, or from authorised third parties.

6. PURPOSE OF PROCESSING

Personal Data is processed for legitimate business purposes including:

- HR administration, payroll, recruitment, onboarding, and employment management
- Site access management, safety compliance, workforce tracking
- Attendance processing through biometrics and geo-location
- Customer service delivery and contract fulfilment
- Vendor onboarding, KYC, due diligence, and payment processing
- Statutory compliance, inspections, audits, and regulatory reporting
- Security, system monitoring, cybersecurity, fraud prevention
- IT operations and digital platform optimisation
- Marketing and business development where permitted

- Enabling operational efficiency across SML's crane, EPC, logistics, and project execution services

7. CONSENT MANAGEMENT AND WITHDRAWAL

Consent is obtained through:

- Website/app acceptance
- Digital forms and portals
- Contractual documentation
- Employee/vendor onboarding
- Click-through, opt-in, or written authorisations

However, withdrawal may affect:

- Employment requirements
- Statutory obligations
- Contract performance
- Operational, security, or safety mandates

Processing of data prior to the withdrawal remains lawful.

8. COOKIES, DIGITAL TRACKING & WEBSITE/APP PRIVACY NOTICE

SML uses cookies, tags, analytics tools, and similar technologies to ensure secure, functional, and optimised use of its websites and mobile applications.

Website/App Data Collected

- Device details
- Browser settings
- IP address
- Usage logs
- Authentication logs
- Location data (if enabled)
- Interaction patterns
- Information submitted through forms

Purposes

- Security and fraud prevention
- Performance monitoring
- Enhancing user experience

- Analytics and platform improvements
- Authentication and access management

Users may control cookies via browser settings.

Third-party cookies operate under their respective policies.

Website/App Privacy Notice

By accessing SML's website or mobile applications, users acknowledge and consent to the collection and processing of digital interaction data as described above.

9. CROSS-BORDER DATA TRANSFERS

SML may transfer Personal Data across borders for HR, operational, administrative, project, or compliance purposes.

Transfers comply with:

- the Digital Personal Data Protection Act, 2023 (India)
- Applicable data protection laws of the destination country
- Standard Contractual Clauses
- Binding corporate safeguards
- Encryption and access-control obligations

Sensitive Personal Data, including biometrics and geo-location, is transferred only under enhanced safeguards.

10. DATA SECURITY AND INTEGRITY

SML implements comprehensive controls, including:

- Encryption at rest and in transit
- Multi-factor authentication
- Role-based access
- Network intrusion monitoring
- Physical security controls
- Device and endpoint protection
- Audit trails and logging
- Regular VAPT exercises
- Least-privilege access enforcement

11. DATA RETENTION AND DISPOSAL

Personal Data shall be retained only for:

- The necessary duration as prescribed under applicable laws for data retention
- Statutory, tax, labour, audit, safety, and regulatory requirements.

Biometric & Geo-location Retention (Integrated)

Such data is retained only as long as necessary for attendance, access control, compliance, audit, or investigation needs, and securely deleted thereafter.

All data is securely destroyed or anonymised upon expiry.

12. THIRD-PARTY PROCESSORS

Third-party processors are bound by:

- Written agreements
- Adequate security requirements
- No-subcontracting without SML approval
- Breach reporting obligations
- Audit and compliance obligations

13. DATA BREACH AND INCIDENT RESPONSE

All breaches must be reported immediately to the VP IT
SML shall:

- Contain the breach within **24 hours**
- Notify affected Your and authorities where required
- Maintain breach registers
- Conduct forensic and root-cause analyses
- Implement corrective action

14. GOVERNANCE AND ACCOUNTABILITY

- The Board oversees privacy governance.
- The VP-IT implements compliance measures.
- Department heads act as Data Owners.
- All employees, contractors, and partners shall comply with this policy.
- Violations shall result in disciplinary action as per the respective company policy and/or applicable laws to protect the rights and remedies of SML.



15. CHILDREN'S DATA

SML does not knowingly collect data of minors (<18) without parental/guardian consent.

16. POLICY UPDATES

The Policy may be updated periodically. The latest version will be available on the website and intranet.

17. GRIEVANCE REDRESSAL AND CONTACT

Name: Parmanand Shinde

Designation: VP -IT

Email: shinde.paramanand@sanghviglobal.com

Address: Sanghvi Movers Limited, S. No. 92, Tathawade, Pune- 411033, Maharashtra.

Effective Date	Version	Approved By
1 st January-2026	1.0	Board of Directors