



DATA PROTECTION & RETENTION POLICY

REF : CEV/POLICY/DPR

ISSUE : A/02.01.2024

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1. Purpose

CEV Engineering Pvt Ltd is committed to protecting personal, employee, customer, and business data, and to retaining records only for as long as legally or operationally necessary. This policy ensures compliance with the Digital Personal Data Protection Act, 2023 (DPDP Act), the Information Technology Act, 2000, applicable Indian labor and tax laws, contractual obligations, and global best practices.

2. Scope

This policy applies to all employees, contractors, suppliers, dealers, customers, and third parties handling CEV Engineering Pvt Ltd's data in physical or electronic form.

3. Data Protection Principles

This Policy describes generally acceptable privacy principles (GAPP) for the protection and appropriate use of personal information at CEV Engineering. 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:

- **Notice:** CEV Engineering shall provide data subjects with notice about how it collects, uses, retains, and discloses personal information about them.
- **Choice and Consent:** CEV Engineering shall give data subjects the choices and obtain their consent regarding how it collects, uses, and discloses their personal information.
- **Rights of Data subject:** CEV Engineering 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.
- **Collection:** CEV Engineering shall collect personal information from data subjects only for the purposes identified in the privacy notice/ contract agreements and only to provide requested product or service.
- **Access:** CEV Engineering shall allow data subjects to make inquiries regarding the personal information about them, that CEV shall hold and, when appropriate, shall provide access to their personal information for review, and/or update.
- **Disclosure to Third Parties:** CEV Engineering shall disclose personal information to Third Parties / partner firms only for purposes identified in the privacy notice /contract agreements. CEV Engineering shall disclose personal information in a secure manner, with assurances of



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protection by those parties, according to the contracts, laws and other segments, and, where needed, with consent of the data subject.

- **Safety/Security:** CEV Engineering shall protect personal information from unauthorized access, data leakage and misuse. CEV Engineering processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures
- **Quality:** CEV Engineering shall take steps to ensure that personal information in its records is accurate and relevant to the purposes for which it was collected.
- **Monitoring and Enforcement:** CEV Engineering shall monitor compliance with its privacy policies, both internally and with Third Parties, and establish the processes to address inquiries, complaints and disputes.

4.0 Collection of Personal Information

Personal information may be collected online or offline. Regardless of the collection method, the same privacy protection shall apply to all personal information.

1. **Purpose of Collection** - Personal information shall not be collected unless either of the following is fulfilled:
 - the data subject has provided a valid, informed and free consent,
 - processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract,
 - processing is necessary for compliance with the organization's legal obligation,
 - processing is necessary to protect the vital interests of the data subject,
 - processing is necessary for the performance of a task carried out in the public interest
2. Data subjects shall not be required to provide more personal information than is necessary for the provision of the product or service that data subject has requested or authorized. If any data not needed for providing a service or product is requested, such fields shall be clearly labelled as optional. Collection of personal information shall be avoided or limited when reasonably possible.
3. Personal information shall be de-identified when the purposes of data collection can be achieved without personally identifiable information, at reasonable cost.



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4. When using vendors to collect personal information on the behalf of CEV, it shall ensure that the vendors comply with the privacy requirements of CEV as defined in this Policy.
5. CEV shall at minimum, annually review and monitor the information collected, the consent obtained and the notice / contract agreement identifying the purpose.
6. CEV shall review the privacy policies and collection methods of Third Parties before accepting personal information from Third-Party data sources.

5.0 Data Security Measures

- Technical Measures:
 - a. Use of encryption and anonymization where applicable.
 - b. Implementation of secure servers and networks.
- Organizational Measures:
 - a. Access controls to limit data access to authorized personnel only.
 - b. Regular training for employees on data protection and privacy.

6.0 Retention Periods for Different Types of Data

Category of Data	Retention Period	Legal/Business Reference
Employee Records (personal files, ID proofs, contracts)	7 years after separation	Companies Act, Income Tax Act
Payroll & Salary Records	8 years	Income Tax Act, 1961
Attendance, Leave & Timesheets	3 years	Shops & Establishment Act
Recruitment Data (CVs, interview notes)	1 year	DPDP Act – data minimization
Health & Safety Records (medical, accident reports)	10 years	Factories Act
Training Records	5 years	Internal policy
Customer Data (sales contracts, invoices, communication)	8 years	Companies Act, GST Act
Vendor/Supplier Contracts & Invoices	8 years	Companies Act, GST Act
Tax Records & Statutory Filings	8 years	Income Tax Act, GST Act
Board & Statutory Records (minutes, registers, resolutions)	Permanent	Companies Act, 2013
Financial Statements & Audit Reports	Permanent	Companies Act, 2013
IT & System Logs (server logs, email logs, access logs)	1–2 years	IT Act, 2000



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CCTV Footage	30–90 days (unless required for investigation)	Industry best practice
Whistleblower/Grievance Reports	7 years	SEBI/Whistleblower guidelines
Intellectual Property Records (designs, patents, drawings)	Permanent	Legal/IPR requirement

7.0 Data Disposal & Destruction

- Paper records shall be shredded or pulped securely after expiry of retention period.
- Electronic records shall be permanently deleted using secure erasure methods.
- Sensitive data may be anonymized or archived where immediate deletion is not possible.

8.0 Dispute Resolution and Recourse

Employees with inquiries or complaints about the processing of their personal information shall first discuss the matter with their immediate supervisor. If the employee does not wish to raise an inquiry or complaint with an immediate manager, or if the manager and employee are unable to reach a satisfactory resolution of the issues raised, the employee shall bring the issue to the attention of the Ethics committee.

Effective Date: 02.01.2024

Young Jin Kim
Managing Director