



DATA PRIVACY POLICY

Version Control

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Classification	INTERNAL USE

Version Number	Date of Release	Nature / Description of Change	Prepared / Changed By	Approved By
1.0	02-01-2024	Initial Release	Deep Shah	Gautam Udani
2.0	02-01-2025	Initial Release	Deep Shah	Gautam Udani

1)SCOPE OF THIS PRIVACY STATEMENT

Infini Systems Limited (referred to as **Infini Systems Limited**, “we” or “us”) is a Software as a Service (SaaS) Provider. We offer services such as providing content libraries, file sharing & secure data rooms (collectively termed as “Services”).Infini Systems Limited owns and operates <https://www.Infinisystem.com/> (hereinafter referred to as ‘website’).

The Infini Systems Limited Employee Privacy Statement (the “Statement”) outlines our practices regarding the collection, use, and disclosure of our Employees’ Personal Data. “Personal Data” means individually identifiable information about a person, including you, that is collected or otherwise received by Infini Systems Limited. This Statement applies to employees and third-party contractors. “Employee” for the purpose of this Statement means current employees, former employees, directors, interns, successful applicants, and other permanent or temporary workers.We may, from time to time, outsource services, functions, or operations of our business to third-party service providers. When engaging in such outsourcing, we may process certain Personal Data of third-party contractors (for example, consultants) who do not qualify as employees during their association with Infini Systems Limited.

2)USE OF PERSONAL DATA

We may use and disclose Personal Data for purposes connected to your employment. These purposes include:

- Workflow management, such as assigning, managing, and administering projects
- Compensation related-activities, including compensation analysis
- Payroll processing
- Performance management
- Succession planning
- Benefits, pension and personnel administration, including health and medical benefits, leave entitlements, and bonuses
- Talent management, career development, engagement, and teambuilding (including special events), or operations management
- Retirement planning and management
- Travel, transportation, and relocation planning
- IT activation, support, and authentication
- Organizational development and communications
- Corporate governance or corporate affairs
- Administration and management of Infini Systems Limited’s financial affairs, tax validation, and optimization
- Preventing unauthorized individuals from accessing, changing or deleting your Personal Data
- Supporting any claim, defense or declaration in a judicial or quasi-judicial proceeding
- Monitoring and preventing sexual harassment, discrimination, fraud or other criminal activities
- Safety and security monitoring while on premises (for example, CCTV monitoring and access control cards) and while working from home
- Facilitating onboarding and exit of personnel
- Facilitating internal recruitment and hiring
- Ensuring an engaging experience, realizing continuous improvement, and personalizing the HR services
- Communicating internally or externally (for example, through newsletters or social media)
- Offering Employee-specific opportunities and coupons
- Managing memberships to professional associations
- Performing internal or external audits
- Conducting corporate transactions (including mergers, acquisitions and divestments)
- Organizing internal and external events

- Achieving the purposes contemplated by any drug and/or alcohol policies adopted by Infini Systems Limited from time to time, if any, to the extent permitted by applicable law
- Managing exceptional situations, serious threats to health and protecting you and other individuals (for example, other Employees) in such situations
- Investigating and enforcing disciplinary measures
- Dealing with legal disputes involving you, or other Employees, workers, and contractors, including accidents at work
- Carrying out our contractual obligations with customers and suppliers (for example, Personal Data included in purchase orders, quality complaints, email correspondences).

3) THE PERSONAL DATA Infini Systems Limited COLLECTS

Infini Systems Limited collects, uses, and stores certain Personal Data about you for the purposes described under the above section "Use of Personal Data" and in part for the purposes described further in this section. The Personal Data that Infini Systems Limited collects, uses, and stores include:

Your personal and family information, such as:

- Name
- Contact information (including home address, home phone number, mobile phone number, and email address)
- Emergency contact information
- For communication and employee relations purposes: social media profiles (for example, LinkedIn handle), and contact information, if and to the extent permitted by applicable law
- Citizenship and country of residence
- Date of birth (age)
- Government-issued identification IDs
- Gender
- Salary information and certain income tax documentation of the Employee
- For compliance with applicable immigration requirements and to facilitate corporate travel: immigration status and information, such as passport and other identity documentation, citizenship, residency and other visas
- For corporate governance and other regulatory requirements: information, such as passport and other identity documentation, citizenship, residency, and other visas, signature
- Forms and information relating to the application for, or in respect of changes to, employee health and welfare benefits, including short- and long-term disability, medical care, etc.
- Education, employment or work history and other relevant background information, including CV and related information
- Letters of offer and acceptance of employment
- Information relating to any previous applications you may have made to Infini Systems Limited and/or any previous employment history with Infini Systems Limited
- Bank account information
- Photographs

Information related to your job, such as:

- Job title and description
- Job location]
- Department
- Employee identification number
- Work address, telephone number, and email address
- Start and end-dates of employment
- Supervisor
- Reporting level
- Employment status (full-time or part-time; hourly or salaried)
- Contract type

- Cost centre and credit card information, expenses, and related audit flags
- Compensation, bonus, and related information (including pay scale, variable compensation, and benefits, etc.)
- Pay periods
- Overtime and commissions information
- Pension and benefits information
- Training records
- Job performance and related information and opinions, including disciplinary measures
- Opinions, including named results
- Talent review ranking and leadership potential ranking
- Payroll information
- Leave entitlement, sickness and absences
- Mandatory policy or training acknowledgement sign-off sheets or similar communications (paper or electronic)

4) METHODS OF COLLECTING PERSONAL DATA

We may collect Personal Data about you in the following ways:

- Directly from you, such as through the application and hiring process (online or in-person)
- From other parties, subject to the requirements of applicable law. These parties may include:
 - References
 - Publicly available information
 - Former employers
 - Other Employees (for example, to nominate and celebrate a colleague for outstanding achievements); and
 - Other third parties, such as background check agencies like OnGrid (A brand of Handy Online Solutions Private Limited).

5) BASIS OF USE OF YOUR PERSONAL DATA

We may collect and use your Personal Data for the following functions:

- Perform your employment contract (or other similar type of agreement) with Infini Systems Limited; and
- Comply with regulatory requirements (pursuant to, among others, labour, tax, and social security laws).
- We may process some of your Personal Data when this is in our legitimate interest. This is the case, for example, when we collect and use your Personal Data to:
 - Organize team building events
 - Secure our premises and IT systems
 - Handle and investigate complaints
 - Prevent or investigate fraud or other criminal activities.
- Sometimes, we may process your Personal Data after you have given us your prior consent. For example, in certain circumstances, we will ask your prior consent before using your photos or videos as part of our corporate communications.

6) NON-AVAILABILITY OF PERSONAL DATA

- Our ability to perform our obligations derived from your employment contract (or similar type of agreement) with Infini Systems Limited and our ability to comply with our legal and contractual obligations sometimes depend on Infini Systems Limited having access to and being able to use certain Personal Data.

- If you do not provide us with the Personal Data we request or if you ask that we stop processing your Personal Data, we may not be able to perform our contractual obligations (such as paying you for your work) or we may be in breach of one or more legal obligations applicable to us.

7) ACCESS TO PERSONAL DATA

- We may also share Personal Data with other third parties subject to your prior consent.
- Access to your Personal Data will be given to those who need such access for the purposes listed above or where required by law. These parties include, among others, the Infini Systems Limited Human Resources department, relevant business managers, and, on limited occasions, members of the Information Technology ("IT"), Finance, Tax, and Legal departments.
- We may share your Personal Data with affiliates or subsidiaries that provide shared services within Infini Systems Limited, for example, in connection with HR services, financial and accounting support, credit control, recordkeeping, and payroll.
- We will carefully select such third parties and will require them to only process Personal Data in accordance with the instructions of Infini Systems Limited. The recipients of these disclosures and their information storage systems may be located in other countries. If Infini Systems Limited discloses Personal Data to such recipients, we will require that they will provide an adequate level of protection for your Personal Data and that appropriate security measures are in place.
- Where permitted by applicable law, Personal Data also may be disclosed in connection with a corporate restructuring, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of Infini Systems Limited (or any of its subsidiaries or affiliated companies).
- Finally, Personal Data may be disclosed and transferred to respond to law enforcement requests or where required by applicable laws, court orders, or government regulations.

8) WHERE IS YOUR PERSONAL DATA STORED?

- We maintain reasonable administrative, technical, and physical safeguards to protect Personal Data against accidental or unlawful destruction, or loss, alteration, unauthorized disclosure or access. In the event that we do transfer any Personal Data, we will only do so in accordance with applicable law, and will require that there is an adequate level of protection for the Personal Data and that appropriate security measures are in place.
- In the event that we do transfer any Personal Data internationally, we will only do so in line with applicable law and we will require that there is an adequate level of protection for the Personal Data and that appropriate security measures are in place.

9) EMPLOYEE RIGHTS

Depending on and subject to applicable laws, you have certain rights regarding the Personal Data that we hold about you. These rights may include the following:

- The right to access the Personal Data we hold about you
- The right, under certain circumstances, to block or suppress further use of your Personal Data
- The right to request the rectification of the Personal Data that we hold about you if that information is inaccurate or incomplete
- The right to object to certain types of processing The right, under certain circumstances, to request the deletion or removal of your Personal Data

We will respond to your request as soon as practically possible and always within 2 months.

10) RETENTION AND ACCURACY OF PERSONAL DATA COLLECTED

- Infini Systems Limited intends to keep Personal Data in its control accurate and up-to-date. We will retain Personal Data only as long as is necessary to carry out the purposes described in this Statement.
- If there are any changes to your Personal Data, please notify the Human Resources department. If you inform us of any changes or we otherwise become aware of any factual inaccuracies in your Personal Data, we will seek to promptly correct such inaccuracies.

11) REVISIONS TO THE STATEMENT

- Infini Systems Limited may update the statement from time to time, and when we do, we will reissue a revised statement and notify all Employees of any changes, to the extent required by law.

Last Updated: 02-01-2025