



## **PRIVACY POLICY**

Latest amended & adopted on May 17, 2025

### **ALLIED ENGINEERING WORKS LIMITED**

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**CIN:** U31900DL2011PLC220430

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## ALLIED ENGINEERING WORKS LIMITED

### PRIVACY POLICY

#### PURPOSE AND SCOPE

We, Allied Engineering Works Limited (“the **Company or the AEWL**”), respect the privacy of individuals and have implemented reasonable security practices and procedures that are commensurate with the information assets being protected and with the nature of our business.

The purpose of this privacy policy (“**Policy**”) is to set out the process and the framework within which the Company collects, receives, stores, deals or handles Personal Information including Sensitive Personal Data or Information.

The Policy shall become effective from January 01, 2025, In this

Policy, unless the context otherwise requires:

1. “**Personal Information**” refers to any data that relates to an individual and is capable of identifying them—either directly or indirectly—when combined with other information that is available or likely to be available to the Company. This includes, but is not limited to, name, educational qualifications, contact details (such as email address, phone number, and physical address), spoken languages, gender, date of birth, voter ID, passport number, PAN, marital status, details of dependents, emergency contacts, photographs, and similar identifiers.
2. “**Sensitive Personal Data or Information**” refers to a subset of Personal Information that includes the following details related to an individual:
  - a) Passwords;
  - b) Financial information, such as bank account details, credit card, debit card, or other payment instrument information;
  - c) Physical, physiological, and mental health conditions;
  - d) Sexual orientation;
  - e) Medical records and history;
  - f) Biometric data;
  - g) Any information related to the above categories that is provided to the Company for the purpose of availing services; and
  - h) Any such information received by the Company for processing, storage, or handling under a lawful contract or otherwise.

Provided that any information that is publicly available, accessible in the public domain, or disclosed under the Right to Information Act, 2005 or any other prevailing law shall not be considered Sensitive Personal Data or Information.

The words and expressions used in this Policy but not defined herein shall have the meanings assigned to them under the Information Technology Act, 2000 (“IT Act”) and the Information

Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (“IT Rules”), as applicable.

## DEFINITIONS

For the purposes of this Privacy Policy:

- a) **Account:** means a unique account created for you to access our website.
- b) **Cookies:** are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses. Cookies help inform websites about the user, enabling the websites to personalize the user experience.
- c) **Device:** means any device that can access the website such as a computer, a mobile device or a digital tablet.
- d) **Personal Data:** means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available is capable of identifying such person.
- e) **Service Provider:** means any person or legal entity who processes the personal information on behalf of the AEWL as may be shared by AEWL.
- f) **Usage Data:** refers to data collected automatically, either generated by the use of the website or from the website infrastructure itself (for example, the duration of a page visit).

## INFORMATION WE COLLECT

### Mode of information collection

1. We collect your information directly from you through offline documentation and/or via our Website. We may also gather information when you visit our offices to inquire about or avail our services, or when you participate in conferences, seminars, webinars, or other events organized by us. You acknowledge and consent to the collection and processing of such information for the purposes outlined in this Policy.
2. We may also obtain information about you from third parties, such as service providers, for the purpose of offering relevant services, promotions, and marketing activities. Such information will be collected, used, and processed only with your consent. Additionally, we and our service providers may monitor, record, and retain conversations and/or electronic communications between you and us, where deemed necessary and permitted.
3. We may collect Personal Information (including Sensitive Personal Data or Information) that you voluntarily provide to us during the course of our business, including through responses to job postings, queries, complaints, feedback, and other forms of communication.

### **Information we process about You includes**

1. Personal data includes all information that we collect and process, either directly or indirectly, about you as an individual. This may include, but is not limited to, your name, email address, mobile number, and other personally identifiable details.
2. We may also automatically collect certain information about the devices you use to access and interact with our website. This may include your IP address, device identifiers, browser type, and browsing behavior, which may be gathered through the use of cookies, web beacons, and similar tracking technologies (collectively referred to as “Cookies and Other Tracking Technologies”).

### **USE OF INFORMATION**

We may process your personal data when it is necessary for legitimate business purposes, including but not limited to the following:

1. Providing and delivering our products and services;
2. Monitoring, maintaining, and improving our website and its content;
3. Conducting market research and surveys to enhance our offerings;
4. Sending you marketing communications, promotional materials, and updates about our products and services—only with your prior consent where required;
5. Complying with applicable local and international laws, regulations, policies, voluntary codes, directives, judgments, or court orders, as well as any contractual obligations arising from agreements with regulatory or enforcement authorities or in response to their requests;
6. Establishing, exercising, or defending legal rights in connection with legal proceedings (including potential proceedings), and obtaining legal or professional advice;
7. Surveillance of premises through video recordings for security and safety purposes;
8. Responding to and processing your requests, including addressing queries, complaints, or feedback.

We will use your personal data solely for the purposes for which it was collected. This data is retained and processed to enable us to manage our business operations and our relationship with you effectively, lawfully, and appropriately—for the duration of your association with us and, where necessary, even after it ends.

Failure to provide certain required personal data may hinder our ability to fulfill contractual obligations or comply with legal and regulatory requirements. It is therefore essential that the personal data we hold about you remains accurate and up to date. Please notify us promptly of any

changes.

We may share your personal data with trusted third parties and/or affiliated entities within our corporate group. These parties are obligated to maintain the confidentiality and security of your data, and to process it strictly in accordance with our instructions, in compliance with applicable data protection laws and regulations.

## **LAWFUL BASIS OF PROCESSING**

**Consent:** In some cases, we ask you for your Consent to process your personal data, you can withdraw your Consent at any time, which will not affect the lawfulness of the processing before your Consent is withdrawn. If you would like to withdraw your Consent, you can do so by contacting us, however, your withdrawal of Consent will not impact Processing of your personal information by us for legitimate purpose such as Processing in compliance with applicable laws or under instruction of government authorities.

**Legitimate Interest:** We process certain data for the legitimate interests of the Company, its affiliates, partners, customers, or in compliance with applicable laws including notice from government authorities. These legitimate interests include, for example, contacting you to provide support or sending you marketing information (subject to applicable law); detecting, preventing, and investigating illegal activities and potential security issues; and maintaining and improving the Website and applications. The company will take all reasonable efforts while relying on its legitimate interests for Processing personal data only after balancing our interests and rights against the impact of the Processing on individuals.

**Performance of a Contract:** We also process personal data on the basis of contractual necessity, where it is necessary for the performance of a contract or pre- contractual steps at your request.

**Other Legal Basis:** In some cases, we may have a legal obligation to process your personal data, such as in response to a court or regulator order. We also may need to process your personal data to protect vital interests, or to exercise, establish, or defend legal claims.

## **OUR POLICY CONCERNING CHILDREN AND THEIR DATA**

1. We are committed to protecting the privacy and safety of children. In certain circumstances, we may process personal data of children for associated services and social service initiatives. However, we take utmost care to comply with applicable laws and regulations regarding the Processing of children's personal data.
2. When processing such data, we take reasonable efforts to obtain appropriate Consent from parents or legal guardians, in accordance with the relevant legal requirements. We ensure that the collection, use, and disclosure of children's personal data is limited to what is necessary for the intended purposes and is done in a secure manner.
3. If you believe that we may have inadvertently collected personal data from a child without proper Consent or have any concerns regarding the Processing of children's data, please contact us

through email at [compliance@aewinfra.com](mailto:compliance@aewinfra.com) or after filling the Contact Us (<https://aewinfra.com/contact-us/>) page of our website and we will take reasonable endeavours to promptly address the issue. We encourage parents and guardians to actively participate in and supervise their children's online activities to ensure their privacy and safety.

## **RECIPIENTS OF DATA**

Your personal data processed by the company will only be accessible by a limited list of recipients on a need-to-know basis or where required by law.

**a. Within our organization:**

Within our organization, access to your data is limited to those persons who as per company's internal policies and procedures are authorized and require access in order to provide you with the Products and Services, and to respond to your inquiries.

**b. Third party(ies):**

We may use service providers & Third parties for operating and improving the function of website and services being offered. We endeavour to ensure that these service providers access, process, and store information about you only for the purposes we authorize, through the execution of relevant instrument in this regard.

Further our service may contain links to other websites that are not operated by us. if you click on a third-party link, you will be directed to that third party's website. We strongly advise you to review the privacy policy of every website you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party websites or services.

**c. Authorities:**

We may access, preserve, and disclose information about you to government authorities, if we believe Disclosure is in accordance with or required by, applicable law, regulation, legal process, or audits. We may also disclose information about you if we believe that your actions are grossly inconsistent with our policies, and/or it affects the rights, property and reputation of the Company or others.

**d. Transfer of business:**

If we (or our assets) are merged, amalgamated, acquired, transferred or if we go out of business, enter bankruptcy, or go through some other change of control, personal information could be one of the assets transferred to or acquired by a Third party.

## **SECURITY PRACTICES & RETENTION OF PERSONAL INFORMATION**

The Company has implemented reasonable security practices and procedures (including appropriate managerial, technical, operational and physical security control measures) to ensure that the Personal Information and Sensitive Personal Data or Information is collected and preserved in a secure manner. The database is stored on servers secured behind a firewall and the access to servers is

limited and password protected.

Your personal data is processed and retained securely for no longer than is necessary for the purposes for which the personal data was collected or unless required as per the applicable laws. At the expiry of such periods, your personal data will be deleted or archived to comply with legal retention obligations or in accordance with applicable statutory limitation periods.

### **INFORMATION PROVIDER'S RIGHTS IN RELATION TO THEIR SENSITIVE PERSONAL DATA OR INFORMATION COLLECTED BY THE COMPANY**

- a. All Sensitive Personal Data or Information provided to the Company by an information provider is voluntarily provided by such information provider.
- b. The information provider may write to the Grievance Officer (Or any other designated officer), whose details are provided in Clause below, to access, review, modify or correct his/her Sensitive Personal Data or Information. However, the Company is not responsible for the authenticity of the Sensitive Personal Data or Information provided by the information provider.
- c. The information provider shall, at any time while availing the services or otherwise; also have an option to withdraw his/ her consent given in relation to his/ her Sensitive Personal Data or Information. However, please note that withdrawal of consent will not be retrospective in nature and shall be applicable prospectively. Such withdrawal of the consent shall be sent in writing to the Company at [compliance@aewinfra.com](mailto:compliance@aewinfra.com). In case the information provider does not provide his/ her information or consent for usage of Sensitive Personal Data or Information or subsequently withdraws his/ her consent for usage of the Sensitive Personal Data or Information so collected, the Company reserves the right to discontinue the services for which the said information was sought.

### **GRIEVANCE REDRESSAL**

Any discrepancies or grievances related to the processing of Personal Information or Sensitive Personal Data or Information should be promptly reported to the designated Grievance Officer (or any other appointed officer) using the contact details provided below:

Email: [compliance@aewinfra.com](mailto:compliance@aewinfra.com)

Contact No.: 011-470-82775

### **CONDITIONS OF USE, NOTICES, AND REVISIONS**

If you choose to use our services, your use and any dispute over privacy is subject to this notice and Allied Engineering Works Limited or its directors, officers, employees, agents or representatives (collectively "representatives"), including limitations on damages, resolution of disputes, and application of the prevailing law in India. If you have any concerns about privacy on our website, please contact us with a thorough description, and we will try to resolve it.

### **RESTRICTION OF LIABILITY**

We make no claims, promises or guarantees about the accuracy, completeness, or adequacy of the contents available through the Services and expressly disclaim liability for errors and omissions in the contents available through the Services.

No warranty of any kind, implied, expressed or statutory, including but not limited to the warranties of non-infringement of third-party rights, title, merchantability, fitness for a particular purpose and freedom from computer virus, is given with respect to the contents available through the Services or its links to other internet resources as may be available to you through the Services.

Reference in the Services to any specific commercial products, processes, or services, or the use of any trade, firm or corporation name is for the information and convenience of the public, and does not constitute endorsement, recommendation, or favouring by AEWL.

### **CHANGES TO THIS POLICY**

The Company reserves the right to revise and update this Policy at its sole discretion. Any such revisions will be effective on and from the date of posting the same on the website of the Company and will apply to all information collected both prior to and following the effective date.

By entering this website, the visitor consents to the terms of this Policy. By submitting his/her Personal Information and Sensitive Personal Data or Information to the Company, the visitor will be treated as having given his/her permission for processing the same in a manner provided in this Policy.