

Plot No. 8, West Central Ave, Raipur 492001

CIN: U29304CT2022PTC013902

E: <u>director@patcorn.in</u> P: (+91) 9109296514

Privacy Policy

(As per Information Technology Act, 2000, the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, and the Digital Personal Data Protection Act, 2023)

Approved by Board of Director in Board Meeting held on May 29, 2025





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1. Introduction

Patcorn Drymix Private Limited ("we", "us", or "our") is committed to protecting the privacy and security of personal information entrusted to us by our employees, vendors, customers, and other stakeholders. This Privacy Policy outlines how we collect, use, disclose, and safeguard your personal data in compliance with the Information Technology Act, 2000, the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, and the Digital Personal Data Protection Act, 2023 ("the Act").

2. Definitions

- **Personal Data:** Any information that relates to an identified or identifiable individual.
- Sensitive Personal Data or Information (SPDI): Includes passwords, financial information, health information, biometric data, sexual orientation, and any other data classified as sensitive under the law.
- **Data Fiduciary:** An entity that determines the purpose and means of processing personal data.
- Data Principal: An individual to whom the personal data relates.
- **Data Processor:** An entity that processes personal data on behalf of the Data Fiduciary.

3. Information We Collect

We collect personal data in the course of our business operations, including:

a. Employees

- Personal identification details (e.g., name, date of birth, contact information)
- Employment history and qualifications
- Financial information (e.g., bank account details, salary)
- Health information (where necessary)
- Government-issued identification numbers (e.g., PAN, Aadhaar)

b. Vendors

- Business contact information
- Financial details (e.g., bank account numbers, GSTIN)
- Contractual agreements and communications



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c. Customers

- Personal identification details
- Contact information
- Transaction history and preferences
- Payment information

d. Sensitive Personal Data or Information (SPDI)

 As per the Act, includes passwords, financial information, health information, biometric data, sexual orientation, and any other data classified as sensitive under the law.

4. Legal Basis for Processing

We process personal data based on the following legal grounds:

- **Consent:** Obtained from the Data Principal, which is free, specific, informed, and unambiguous.
- **Contractual Necessity:** To fulfill contractual obligations with employees, vendors, or customers.
- **Legal Obligation:** Compliance with applicable laws and regulations.
- **Legitimate Interests:** Pursuit of legitimate business interests, provided these do not override the rights and freedoms of the Data Principal.

5. Purpose of Data Collection

We collect and process personal data for the following purposes:

- **Employees:** Recruitment, payroll, performance evaluation, compliance with labour laws, and other HR-related activities.
- **Vendors:** Contract management, payment processing, and business communications.
- **Customers:** Order processing, customer support, marketing, and service improvement.
- **General:** Compliance with legal obligations, audits, and business operations.





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6. Data Sharing and Disclosure

We may share personal data with:

- **Service Providers:** Third-party vendors who perform services on our behalf, subject to confidentiality agreements.
- Government Authorities: As required by law or to comply with legal processes.
- Affiliates: Within our corporate group, as necessary for business operations.

We do not sell or trade personal data to third parties.

7. Data Security

We implement reasonable security practices and procedures to protect personal data from unauthorized access, disclosure, alteration, and destruction. These measures include:

- Encryption of sensitive data
- Access controls and authentication mechanisms
- Employee training on data protection

8. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes outlined in this policy or as required by law. Upon expiration of the retention period, personal data will be securely deleted or anonymized.

9. Rights of Data Principals

Under the Act, Data Principals have the following rights:

- **Right to Access:** To obtain confirmation of whether personal data is being processed and access to such data.
- **Right to Correction:** To rectify inaccurate or incomplete personal data.
- **Right to Erasure:** To request deletion of personal data when it is no longer necessary for the purposes for which it was collected.
- **Right to Data Portability:** To receive personal data in a structured, commonly used, and machine-readable format.



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- **Right to Object:** To object to the processing of personal data under certain circumstances.
- **Right to Withdraw Consent:** To withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

To exercise these rights, please contact our Grievance Officer.

10. Grievance Redressal Mechanism

We are committed to ensuring that your personal data is handled in a transparent, lawful, and secure manner. If you have any concerns, complaints, or grievances related to our processing of your personal data, we provide the following grievance redressal mechanism in accordance with applicable Indian laws:

10.1 Grievance Officer

In compliance with Rule 5(9) of the IT Rules, 2011 and the provisions of the Digital Personal Data Protection Act, 2023, we have appointed a Grievance Officer to address your concerns related to the collection, storage, use, and disclosure of personal data.

Grievance Officer Details:

Name: Darshan Doshi

Designation: Grievance Officer **Email**: csdarshan@patcorn.in

Office Address: Raipur, Chhattisgarh, India, 492001

10.2 Submission of Grievance

You may submit your grievance in writing or via email to the Grievance Officer using the contact details provided above. Please include the following information in your grievance:

- Your full name and contact details (email and/or phone number)
- A detailed description of the nature of the grievance
- Any supporting documents, if applicable
- Date of the incident (if applicable)

Further, you shall submit grievance in format prescribed in "Annexure – A".

10.3 Acknowledgement and Resolution Timeline

 Acknowledgement: Your grievance will be acknowledged within 24 (twenty-four) hours of receipt.



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• Resolution: The grievance will be resolved within **30 (thirty) days** from the date of receipt, in accordance with Rule 5(9) of the IT Rules, 2011, and Section 13(2) of the Digital Personal Data Protection Act, 2023.

10.4 Escalation

In case grievance is not resolved within 30 days then, it can be escalated to the Board of Directors by contacting them through e-mail: director@patcorn.in.

10.5 No Retaliation

We assure you that raising a complaint or grievance will not result in any form of retaliation, discrimination, or punitive action. We are committed to maintaining the confidentiality and integrity of the grievance process.

11. Cross-Border Data Transfers

We may transfer personal data to countries outside India, provided that:

- The recipient country ensures an adequate level of data protection.
- We have implemented appropriate safeguards, such as standard contractual clauses or binding corporate rules.

12. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. Any updates will be posted on our notice board, and the effective date will be revised accordingly.

13. Contact Us

For any questions or concerns regarding this Privacy Policy or our data protection practices, please contact us at:

Email: csdarshan@patcorn.in



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ANNEXURE – A Grievance Complaint Form

(Privacy/Data Protection-Related Issues)

This form is intended for individuals (employees, customers, vendors, or other stakeholders) to lodge a grievance regarding the handling of their personal data by Patcorn Drymix Private Limited as per the Information Technology Act, 2000, and the Digital Personal Data Protection Act, 2023.

1. Complainant's Details Full Name:
Designation/Relationship to Company (Employee/Vendor/Customer):
Employee/Vendor/Customer ID (if applicable):
Contact Number:
Email Address:
Postal Address:
2. Grievance Details Subject of Grievance:
Detailed Description of the Grievance: (Please provide specific details such as dates, nature of issue, individuals involved, and relevant context)
Is this related to:
☐ Data Collection
□ Data Accuracy
□ Data Sharing
☐ Consent Withdrawal
☐ Access or Portability Request
□ Data Deletion/Erasure
☐ Other (please specify):



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Date of Incident (if applicable):
3. Supporting Documents
Please list any documents or files attached with this complaint:
☐ Screenshots
☐ Communication Records
☐ Identity Proof
☐ Others (please specify):
4. Resolution Sought
Please describe what outcome or corrective action you are seeking:
5. Declaration
I hereby declare that the information provided above is true and accurate to the best of my
knowledge and belief. I understand that the Company may contact me for additional
information or clarification.
Signature:
Date:
Submission Instructions

Please submit this form by:

- Email: csdarshan@patcorn.in
- In-Person: At Registered Office, Raipur, Chhattisgarh, India, 492001
- Post: To Registered Office, Raipur, Chhattisgarh, India, 492001

You will receive an acknowledgment within 24 hours of receipt and a resolution within 30 working days.



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<u>ANNEXURE – B</u> <u>Consent Form for Collection and Processing of Personal Data</u>

(In accordance with the Information Technology Rules, 2011 & Digital Personal Data Protection Act, 2023)

Name of Data Fiduciary (Company/Organization): Patcorn Drymix Private Limited.

Address: Plot No.8, West Central Avenue, Raipur, C.G. (492001)

CIN (if applicable): U29304CT2022PTC013902

Contact Email: csdarshan@patcorn.in

1. Purpose of Consent

In compliance with:

- Rule 5 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, and
- Section 6 of the Digital Personal Data Protection Act, 2023,

we seek your free, specific, informed, and unambiguous consent to collect, store, use, and process your personal and/or sensitive personal data for the following purpose(s): Data Purpose(s): ☐ Employment/HR purposes (e.g., payroll, benefits, health records) ☐ Customer onboarding and service delivery ☐ Vendor registration and contract administration ☐ Compliance with legal or regulatory obligations ☐ Marketing communications (optional) ☐ Any other: 2. Types of Personal Data Collected Depending on the purpose(s), we may collect the following: ☐ Name, contact details, address ☐ Government IDs (e.g., PAN, Aadhaar)* ☐ Financial information (e.g., bank details)* ☐ Health or biometric data* ☐ Login credentials or passwords*

* Denotes Sensitive Personal Data or Information (SPDI) as defined under IT Rules, 2011

3. Manner of Use & Sharing

☐ Any other: _

☐ Employment-related information

• Your data will be used **only** for the purposes stated above.

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- We may share your data with authorized third-party processors (e.g., payroll processors, auditors, cloud service providers) **under confidentiality agreements**.
- We do **not sell** or trade your personal data.

4. Data Retention

Your data will be retained **only as long as necessary** for the above purposes or as required by law, after which it will be deleted or anonymized.

5. Your Rights as Data Principal

As per applicable laws, you have the right to:

- · Access and correct your personal data
- Withdraw consent at any time
- Request erasure or restrict processing (where applicable)
- File a complaint with the Grievance Officer or the Data Protection Board of India

6. Consent Declaration

- I, [Full Name], hereby declare that:
 - I have read and understood the purpose, type of data collected, and how it will be processed.
 - I provide **free**, **specific**, **informed**, **and unambiguous consent** to [Company Name] for the collection, use, storage, and sharing of my personal and/or sensitive personal data.
 - I understand that I may withdraw my consent at any time by contacting the Grievance Officer, without affecting the lawfulness of processing based on prior consent.

Officer, without affecting the lawfulness	of processing based on prior consent.
☐ I CONSENT to the above terms.	
\square I DO NOT CONSENT to the above terms.	
Signature:	
Name:	
Date:	
Place:	

7. Contact Details for Data Queries / Withdrawal of Consent Grievance Officer

Name: Darshan Doshi

Email: csdarshan@patcorn.in

Address: Raipur, Chhattisgarh, India, 492001