

EDWARD FOOD RESEARCH & ANALYSIS CENTRE LIMITED



Edward Food Research & Analysis Centre Limited

DATA PROTECTION POLICY

(Version 1.0)

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Research & Analysis Centre: Subhas Nagar,

P.O- Nilgung Bazar,

Barasat, Kolkata – 700121

Email: efraclab@efrac.org

Registered Office: Synthesis Business Park",

CBD/1, Unit-2-C/B, 2nd Floor,

Action Area- II, Rajarhat, New Town, Kolkata –700157

Email: efraclab@efrac.org

Website: www.efrac.org



S. Bhattacharya

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1. Introduction

Edward Food Research and Analysis Centre Limited (herein after, referred to as “**EFRAC**”) is committed to complying with the Information Technology Act, 2000 (hereinafter referred to as "IT Act") and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (hereinafter referred to as "SPDI Rules").

This comprehensive data protection policy aims to address the key compliance requirements under the Information Technology Act, 2000, and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

This policy outlines the guidelines and procedures for the protection of sensitive personal data or information (SPDI) collected and processed by EFRAC during the course of its business operations.

2. Practices and Policies Statement (SPDI Rules, Rule 4(a))

We are committed to maintaining clear, easily accessible statements of our data protection practices and policies. This document serves to inform all stakeholders of our steadfast dedication to data privacy and security.

3. Data Collection and Consent (IT Act, Section 43A, SPDI Rules, Rule 3 and Rule 5)

3.1 Types of Data Collected

- a) **Personal Data:** This encompasses information that can identify an individual, such as names, email addresses, and contact numbers.
- b) **Sensitive Personal Data:** This includes information requiring higher protection levels, like financial details, health records, and biometric information, as defined under SPDI Rules, Rule 3.

3.2 Consent for Collection

Consent is obtained from individuals before collecting their personal or sensitive personal data, ensuring compliance with SPDI Rules, Rule 5. This consent covers the nature of data collected and its intended use.

4. Individual Rights (SPDI Rules, Rule 5)

- 4.1.** EFRAC shall respect the rights of individuals to access, correct, update, and delete their SPDI, as provided under the SPDI Rules.
- 4.2.** Requests from individuals to exercise their rights shall be promptly addressed and processed within the stipulated time frames specified by the SPDI Rules.

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5. Grievance Officer (SPDI Rules, Rule 5)

EFRAC shall appoint a Grievance Officer responsible for addressing privacy-related complaints and queries from individuals, as required by the SPDI Rules.

6. Data Use and Purpose Limitation (SPDI Rules, Rule 6)

6.1. The collection and use of personal and sensitive personal data by EFRAC are explicitly for purposes communicated at the time of data collection, including service provision, legal compliance, security, and employment processing. This aligns with our commitment to data minimization and purpose limitation.

6.2. EFRAC shall use SPDI only for the purposes for which it was collected and shall not retain it for longer than necessary to fulfill those purposes.

6.3. Any use of SPDI for additional purposes shall require obtaining fresh consent from the individuals concerned, as specified under the SPDI Rules.

7. Disclosure of Information (SPDI Rules, Rule 4(d), Rule 6)

We disclose personal and sensitive personal data under conditions outlined in SPDI Rules, Rule 6, including:

- a) With explicit consent from the data subject.
- b) For legal obligations or processes.
- c) To protect EFRAC's rights and safety, and that of our users and the public.

8. Data Transfer (IT Act, Section 72A, SPDI Rules, Rule 7)

8.1. If SPDI is transferred to third parties or service providers, EFRAC shall ensure that the recipient provides an adequate level of data protection, as per the requirements of the IT Act and SPDI Rules.

8.2. Prior consent from individuals shall be obtained for any cross-border transfer of SPDI, in accordance with the SPDI Rules.

9. Data Security (IT Act, Section 43A, SPDI Rules, Rules 7 & 8)

9.1. EFRAC shall implement and maintain reasonable security practices and procedures to protect SPDI from unauthorized access, disclosure, alteration, or destruction, as mandated under the IT Act and SPDI Rules.

9.2. Access to SPDI shall be restricted to authorized personnel only, and the company shall maintain an access control mechanism.

9.3. Encryption and secure transmission protocols shall be used when transmitting SPDI over networks, as per the requirements of the SPDI Rules.

9.4. Regular audits and risk assessments shall be conducted to identify and mitigate potential security risks to SPDI.

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10. Reasonable Security Practices and Procedures (SPDI Rules, Rule 4(e), Rule 8)

10.1. Security Standards

Adhering to Rule 8, EFRAC implements robust security practices and procedures, benchmarked against IS/ISO/IEC 27001 standards, to protect data from unauthorized access or breaches.

10.2. Security Measures

Our security measures include encryption, access control, secure development practices, and periodic security training for employees, ensuring the confidentiality, integrity, and availability of personal and sensitive personal data.

11. Data Breach Notification (IT Act, Section 43A, SPDI Rules, Rule 9)

11.1. In the event of a data breach that may lead to the unauthorized disclosure of SPDI, EFRAC shall promptly notify the affected individuals and the relevant authorities as required by the IT Act and SPDI Rules.

11.2. The data breach notification shall include details of the breach, the type of information compromised, and the measures taken by the company to mitigate the impact.

12. Employee Training

All employees of EFRAC shall undergo regular data protection training to ensure compliance with this policy, the IT Act, and the SPDI Rules.


13. Policy Review

13.1. This policy shall be reviewed and updated periodically to align with changes in the IT Act, SPDI Rules, and any other relevant data protection laws.

13.2. Employees shall be notified of any updates or changes to this policy.

By implementing this Data Protection Policy, EFRAC seeks to ensure the highest standards of data privacy and security for its customers and stakeholders.

For Edward Food Research & Analysis Centre Limited


Suprotik Bhattacharya
Head- HR Admin & Regulatory Affairs
Date: 1st September 2023

