

Personal Information  
Management System  
Privacy Policy



**A D A M M A**  
INFO SERVICES PVT. LTD.

Madhu Harish

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# ADAMMA PRIVACY POLICY

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5.0	01-March-2022	Introduction of DPO
6.0	05-Oct-2024	Change in Classification and Change in DPO

# Personal Information Management System - Privacy Policy



## I. Policy Scope

Adamma Info Services Private Limited is dedicated to protecting your personal Information and will make every reasonable effort to handle collected Information appropriately. This Privacy Policy ("Policy") describes how Adamma Info Services Private Limited ("Adamma" or "we" or "our") treats Information collected or provided in connection with an end user's ("you" or "user" or "client") use of Adamma products and background screening services (the "Services "). This privacy statement covers the data collected by Adamma. By accessing, using or by providing data directly to Adamma you accept and agree to Adamma's Privacy Policy. We are committed to protecting privacy and information provided by end users to enable Adamma to complete its Services. This Privacy Policy sets forth Adamma policy with respect to Personally Identifiable Information ("PII"), Sensitive Personal Information ("SPI"), High risk, special category data and certain other information that is collected from users visiting the site.

This Policy has been drafted in accordance with the provisions of the Information Technology Act, 2000 and the Rules thereunder, including, without prejudice to the generality of the foregoing, the Information Technology "Reasonable security practices and procedures and sensitive personal data or information" Rules 2011. Your use of and interaction with Adamma's online portals constitutes your unconditional acceptance of the practices described in this privacy policy, as they may be modified from time to time. If you do not agree with and accept all of the practices described in this privacy policy, you may refrain from using Adamma's website/online portals and/or providing or submitting Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI") by means of or while using Adamma's website/online portals. By providing personal information to us, you consent to our collection, use and disclosure of your personal information for a period of 1 year, in accordance with this privacy policy. The word online portals or website wherever used in this privacy policy shall also include web applications, mobile applications, etc.

Adamma Privacy Policy applies to all of the services offered by Adamma Info Services Private Limited including services offered on the websites/online portals. The Policy applies to all the Clients, Vendors, Employees, Directors and such other stakeholders who are associated with Adamma directly, indirectly or otherwise.

## II. Policy Changes

We reserve the right to modify Adamma's privacy policy at any time which will be published on our website. If we make material changes to this privacy policy, we will notify the same by means of a notice on our home page. By continuing to use our service after notice of changes have been published on the website, the Client is deemed to be consenting to the changes.

### III. Policy Content

This policy seeks to answer questions you may have about the Services and Adamma information practices.

x What information we collect and why we collect it x How we share and use that information x General Exceptions x Consent and Update of Records x Services regarding tracking, analytics and email communications x Security and Compliance with regulatory authorities x How we protect your information x Where is the information processed or stored? x Who can use the services? x Data Protection Officer

### IV. Information we collect

#### Personally Identifiable Information

Personally Identifying Information (“PII”) of a person means such information that can potentially identify you, such as your name, date of birth and address. It does not include anonymized, aggregate or statistical information.

Personally Identifying Information that we collect and hold about an individual will vary depending upon the background checks required by the Client and the information the individual supplies to us. Personally Identifiable Information and Sensitive Personal Information or Data (SPI) shall have the same meaning as defined under The Information Technology Act, 2000 read with Rules along with the amendments made thereunder.

Adamma does not collect any Sensitive Personal Data or Information, without due notification to you and without your consent unless it is mandated by law. We recognize the importance of PII and SPI provided to us with respect to privacy issues and confidentiality of the PII and SPI. Therefore, we collect and deal with PII and SPI in accordance with the privacy legislations in India/ other legislations and this Privacy Policy (as amended from time to time).

Personally Identifiable Information about an individual that we may collect and hold includes name, age, date of birth, employment history, reference information, education, professional qualifications, residency, sanctions, immigration status, claims, judgments, insolvency, current and previous directorships, character, personal reputation, and such other checks and enquiries as the client considers necessary to verify information provided by an individual.

From clients we may collect company address and the name, email and phone number of any system users.

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From clients and individuals, we may collect information related to conducting a background check, payment details.

From the sources of our background checks we may collect the name and job title of the person who supplied us with the information.

We recognize the importance of privacy issues and respect the confidentiality of the Personally Identifying Information individuals or clients provide to us. We will collect and deal with Personally Identifying Information in accordance with the local laws and this Privacy Policy (all as amended from time to time).

## **How do we collect information?**

In order to process and verify information for a client's request, the client and Adamma may collect an individual's Personally Identifying Information directly from the individual. We may also collect information which the client provides directly through their client portal access or usage of our applicant portal, wherein clients/applicant upload applicant's details on the portal and access is given to Adamma Users. We collect information to provide better services to all in the following ways:

### **a) Information given to us.**

**i. Clients:** If client want to use the services to screen applicants we may collect the following information including, but not limited to:

- Account creation information, including client name, email address
- Contact information such as address and phone number;
- Corporate and individual applicable license information not limited to Driver license, doctor's license
- If client is an employer, employee identification number

**ii. Applicants:** If applicant directly provide us details who will be the subject of a screening or background check, we may collect the following information including, but not limited to:

- Account creation information, including full name, e-mail address;
- Contact information, including phone number and address;
- Identity verification information, including identity number and date of birth; and • Additional information or supporting documentation submitted or upload regarding identity, background, query;
- Examples include an uploaded picture, a driver's license, or education qualification document

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We may use the Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI"), documents and any responses an individual or third party reference has provided to us for verification of an individual's personal and other information, to collect additional Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI"), and to conduct public court record searches. Example of sources include, but are not limited to, government agencies, law enforcement bodies, publicly available records, public registries, court or tribunal records, insolvency registers, educational institutions, current and/or previous employers, and regulatory and licensing bodies.

## **b) Information used by Adamma.**

We collect information for conduct and delivery of services contracted by our client or applicants. Adamma may collect this information via online request through email, this information includes:

**i. Candidate Information:** Adamma Info Services Private Limited may use (only with permission) this information to provide its client with background check information & additional information regarding products and services.

- verify applicant identity;
- conduct background checks bases upon information provide by client;
- conduct quality assurance checks;
- investigate disputes; or
- provide certain communications, including adverse action notices.
- contact client regarding their use of the Services;
- send client communications regarding updates or modifications to the services.

Adamma obtains client's consent to use, transfer or store the information only for its legitimate business purpose. Such information shall be stored, processed and retained in the Adamma database to be used only for the legitimate business purposes as mentioned in this privacy policy as amended from time to time.

## **V. Information we share**

We do not share Personal Identifiable Information with companies, organizations and individuals outside of Adamma unless one of the following circumstances applies.

- **With client and applicant consent**

We will share applicant Information with companies, organizations or individuals outside of Adamma for employment services when we have client consent to do so.

- **For external processing**

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For conduct of background reports that may arise during the course of the verification service. Adamma may use researchers & third party service Providers, whom Adamma may provide access to client information to select third parties who perform services on our behalf. These third parties provide a variety of services to us, including without limitation conducting components of background checks, billing, fulfillment, data storage, analysis and processing, identity verification, fraud, accounting, auditing, and legal services.

- **For legal reasons**

We will share Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI") /data with companies, organizations or individuals outside of Adamma if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, legal process or enforceable governmental request. • Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security or technical issues.
- Protect against harm to the rights, property or safety of Adamma, our users or the public as required or permitted by law.

x **General visitors: We do not store cookies to track website activity.**

If Adamma is involved in a merger, demerger, acquisition or asset sale or reconstruction we will continue to ensure the confidentiality of any Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI")/ data and give affected users Notices.

**Data Retention: Adamma retains Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI") as needed to provide services or product information, respond to inquiries, or as required by contractual obligation such as Client – Adamma contracts, statutory or other legal obligations. All Client Information is stored/ Retained digitally.**

Data Retention is defined as the maintenance of data in a production or live environment which can be accessed by an authorized user in the ordinary course of business. For the avoidance of doubt, data used in staging, development, and testing or draft versions of data shall not be retained beyond their active use period, nor copied into production or live environments.

The retention period of Adamma data shall be an active use period of 1 year unless an exception has been obtained from client in a documented/stated expression - permitting a longer or shorter active use period by the division responsible for creating, using, processing, disclosing storing and destroying the data or as directed by client contracts.

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Adamma data may be classified into paper data such as contracts or hard drives on servers namely the Adamma production servers and the Adamma backup servers. After active use has expired and according to appropriate exceptions, data shall be archived until the data is destroyed. For the purposes of enforcing retention in accordance with this policy, each function is responsible for the data it creates, uses, stores, processes and destroys

## VI. General Exceptions

If we are required to intercept, disclose, monitor and/or store client Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI"):

- by law;
- to conduct our business;
- to secure our systems; or
- to enforce our own rights, we will do so in the manner as prescribed by law;
- National security.

Such interception, disclosure, monitoring and storage may take place. In that case, we will not be liable for any third party damages howsoever arising from such interception, disclosure, monitoring and storage. In order to ensure that all our users comply with the User Agreement or Terms of Use of the Adamma platform or application, we may monitor Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI") to the extent that this may be required to determine compliance and/or to identify instances of non-compliance. To ensure that the security and integrity of our Services is safeguarded, we may monitor Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI"). This monitoring may include (without limitation) the filtering of incoming and outgoing electronic data messages to identify, limit and/or prevent the transmission of spam, viruses and/or unlawful, defamatory, obscene or otherwise undesirable material or content. We may under certain circumstances procure an element of the Services from a third party service provider. To the extent that it may be necessary, and solely for the purposes of providing the Service to client, Client are deemed to be in agreement of disclosure to such third party of their Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI") that may be necessary for the procurement of services from the third party.

## VII. Withdraw Consent

Client/candidate may at any time withdraw their consent, with exceptions as mentioned in clause VI of this privacy policy of PII and SPI stored with Adamma. Any withdrawal will be effective only after a reasonable duration of 15 days from the date of communication of such withdrawal of consent.

## VIII. Update Records

Clients should promptly update their contact information pursuant to a change or inaccuracy of such information, with their customers/employer or may contact us on their behalf. Applicants may review, access, and change certain account information such as email address, phone number and mailing address via the applicant portal on the services. Requests to change certain other information, such as identity numbers, may require verification before the change is accepted. Applicants can request deletion of certain information in Adamma's control by directly contacting Adamma, as set forth at the end of this Policy. Applicants can dispute background check reports through the applicant portal/ or by directly contacting their employer/customer (requestor), which is accessible through the Services.

Once a Customer, such as an employer, has received a background check report, Adamma Info Services Private Limited does not control the customer's retention of such information.

Our policy is to retain Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI") only as long as reasonably necessary to provide the Services or as otherwise required for legal compliance purposes. For instance, we may retain information, including information from closed accounts, in order to comply with the law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations of any user, enforce our Terms of Use, and/or for any other purposes otherwise permitted by law that we deem necessary in our sole discretion.

Adamma will be unable to proceed with the provision of services to Clients in the absence of necessary permissions or consent from the individual subject to the background check.

## IX. Choices regarding online tracking, analytics and email communications

Adamma may send periodic promotional or informational emails to its Clients. Clients may opt out of such communications by connecting with their concerned account manager or sending an email to Adamma (please see last section for contact email id). Please note that it may take up to 15 business days for us to process opt-out requests. If client opts out of receiving emails about recommendations or other information we think may interest them, we may still send emails about clients account or any services that have been requested or received from us.

## X. Security and Confidentiality

Adamma strives to protect Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI") that we collect, maintain and disclose through the use of reasonable administrative, physical and technical safeguards. Our products and/or services online are transmitted through a Secure Socket Layer (SSL) transmission, which is a protocol for establishing a secure connection for transmission of Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI").

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Adamma has also employed security protocols and measures to ensure confidentiality and protection of Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI"), in order to avert unauthorized access or alteration as well as unlawful disclosure of the collected information. These measures include internal and external firewalls, physical security and technological security measures, as well as encryption of certain information and password protection for account information. Ergo, our security program is designed to: (1) ensure the security and confidentiality of personal identifiable information that may include Pan Number, Aadhar Card Number etc.;(2) protect against any anticipated threats or hazards to the security or integrity of the information; and (3) protect against unauthorized access, use, alteration, or unlawful disclosure of the information that could result in substantial harm or inconvenience to any individual.

**Risk Assessment** – Risk assessment activity is conducted periodically and based on the impact assessment, required security controls are identified and implemented to protect Personal Data.

**Personnel Security** – All employees are background verified at Adamma. Confidentiality agreement and Acceptable use policy are signed with all employees. Awareness training based on data privacy, data security and data privacy incident reporting procedure is conducted periodically. For Adamma's third party service providers, signing the agreement includes clauses related to data privacy, NDA and Code of conduct.

## IT Controls –

- x **Systems & Network Security** controls are applied such as System Hardening, Patch Management, Firewall, Intrusion Detection and Prevention System, Patch Management, End Point Protection, Anti-virus, Data Leak Prevention, VAPT of systems, servers, applications, networking devices and applications and Log Management.
- x **Communication Security controls** such as Encryption (Data at rest and transit, SSL/TLS, SSH, Message digest)
- x **Application security** practices including secure SDLC process, security scanning and IP based restriction. Other data security and access management practices are as per controls described in this section.
- x **Access Management controls** such as access role-based access, password protection, multi-factor authentication and principle of least privileges.
- x **Masking of personal data** wherever not needed. Periodic and need basis access review and reconciliation.
- x **Log Management** -Logs are stored at secure place. All accesses to the applications are logged in a secure platform and/or application specific database down to the activity level.
- x **Business Continuity** is ensured through highly resilient and redundant architecture, regular and systematic backups for all business-critical applications and servers as per the defined frequencies. Periodic testing of business continuity & disaster recovery plans is conducted, and continual improvement actions are taken.

## Physical Security Controls –

- x Adamma's premises are protected 24/7 through security guards to restrict any unauthorized entry.
- x CCTV monitoring of all entry, exit points and server rooms.
- x Proximity Card based physical access control system, Biometric eye-scan is in place to capture the entry of employees and register are maintained for all visitors. Reconciliation is done periodically.
- x Company ID Cards for all employees.
  
- x Visitor access management process and Inventory Management process is implemented.
- x Restricted areas are labeled, and entry is allowed for only authorized users.
- x There is 24/7 Power back up to support smooth functioning of the facilities. Preventive maintenance is done for support equipment. Facility temperature is maintained with air conditioners. Fire Detection & Prevention system is implemented.
- x Fire Marshal has been nominated and duties are assigned to each working floor to ensure the timely evacuation in case of emergency. Considering the data center security, we have water leakage alarm, rodent repellent system implemented in place, humidity & temperature monitoring mechanism, separate visitor registers for restricted area.

## Incident Management Process –

Though Adamma has the best possible controls to protect privacy of your Personal Data, there is an incident management policy and procedure implemented to address any security incidents/privacy breach. Incidents are reported, recorded, investigated, and responded with the corrective action plan in a timely manner. There is a mechanism to notify the impacted clients (if applicable) who must further notify the respective individual/s

## XI. Compliance and cooperation with regulatory authorities

Adamma ensures, We regularly review our compliance with the Policy. We also adhere to several self-regulatory frameworks, including and not limited to adherence to Information Technology, Privacy and Data Protection legislations applicable in India.

## XIII. Information processing or stored

For the purposes of processing or storing information, Adamma employs servers installed in its facility located in Noida, India. Our servers reside in a secure environment protected from unauthorized access, natural disaster, fire or other compromising conditions. Adamma uses servers located in facility in Noida, India. Additionally, Adamma may engage with its partners or affiliates located in India in order to store and process information for the purposes of backup or retention, as the case may be. By using our services, Clients consent to transmit data to sources

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for verification that may be within India or outside India. Adamma ensures safe data transmission and handling.

## **XIV. International – Onward Transfer of Personal Identifiable Information**

We may disclose Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI") for the purposes of conducting our services to overseas recipients. The circumstances of disclosure may be as follows: -

We may need to disclose an individual's Personally Identifiable Information overseas in order to carry out background checks. For example, if an individual lived, studied or worked overseas, we may need to disclose that individual's Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI") to obtain data from sources, employers, third party reference or education institutes. Disclosures of this kind may be to any country in the world, depending upon the nature and scope of work to be carried, and where the candidate's data resides.

We may also disclose an individual's Personally Identifiable Information ("PII") & Sensitive Personal Information ("SPI") to related bodies for purposes including operations, processing of background report or make it accessible to law enforcement and national security authorities in India, upon receipt of authorization letter, notice, warrants or legal mandate

## **XVI. Information from Children**

Adamma background verification is not directed to children under the age of 18 as per the local legal requirement of the country, and we do not knowingly collect personally identifiable information from children under the age of 18. If we learn that we have collected personally identifiable information of a child under the age 18, we will take reasonable steps to delete such information from our files as soon as is practicable.

Please contact [info@Adamma.com](mailto:info@Adamma.com) if you believe we have any information from or about a child under the age of 18.

## **XVIII. DPO/Privacy protection officer**

As required under The Information Technology Act of India, the name and contact details of the Data Protection Officer are as provided below:

**Name:** Madhu Harish

**Email:** [info@Adamma.com](mailto:info@Adamma.com)

**Phone Number :** + 91 8041104163

**Company :** Adamma Info Services Private Limited

**Address :** #36 Maruthi Surana Bhavan, Thambuchetty Road, Coxtown, Bangalore -560005

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The DPO is designated exclusively for addressing discrepancies and privacy of data providers with respect to processing of information in a time bound manner. Please do NOT use the contact information for login issues for any portal of Adamma.