

PRIVACY POLICY – INDIA

Your Privacy Is Important to Asif Yahiya Sukri

In the ordinary course of business, Asif Yahiya Sukri collects, uses, and shares personal information pertaining to its employees, its clients, and others. Obtaining this information is important to our ability to conduct our operations and to deliver the highest level of service, but we also recognize that you expect us to treat this information appropriately.

This policy sets out basic principles for collecting, using, disclosing and protecting personal information consistent with Indian information security laws and associated regulations. As used throughout this policy, the term “Asif Yahiya Sukri” refers to Asif Yahiya Sukri LLP, AYS (India) associated entities.

The Personal Information We Collect

In this policy, “personal information” means any information relating to you that directly, or indirectly in combination with other information that we have or are likely to obtain, allows us to identify you. Examples of personal information include: your name, e-mail and residence addresses, telephone numbers, photographs, all employment-related and compensation-related information, and government-issued identification numbers.

Asif Yahiya Sukri also may collect and process, especially as to its own personnel, certain personal information constituting “sensitive personal information” under applicable law. This includes financial information such as payment instructions and bank account details, physical or mental health condition, medical records and history, and information received by Asif Yahiya Sukri from third parties under contract for processing.

Use of Personal Information

We process personal information pertaining to our staff for a variety of general human resources administration and related business purposes including: taxation calculations, wage administration, performance evaluations, contingency planning, business travel, training, career planning, and recruitment. Personal information concerning client personnel and other non-employee individuals transacting with Asif Yahiya Sukri will be used to administer and facilitate our relationship with you, for internal operational purposes, and to satisfy our legal and regulatory obligations.

Disclosing Personal Information

Asif Yahiya Sukri does not disclose your personal information to third parties, except as described in this policy. Third party disclosures may include sharing such information with our affiliated companies worldwide for compliance, risk management and operational purposes and with non-affiliated services providers such as those providing professional, legal or accounting advice. Non-affiliated service providers are required to maintain the confidentiality of such personal information and to use it only in the course of providing such services and only for the purposes authorized by Asif Yahiya Sukri.

We may also disclose personal information to fulfill client instructions, to protect our rights and interests and those of our business partners, or pursuant to your express consent. Finally, under limited circumstances, your personal information may be disclosed to third parties as permitted by, or to comply with, applicable laws and regulations; for instance, when responding to a subpoena or similar legal process, to protect against fraud and to otherwise cooperate with law enforcement or regulatory authorities or with organizations such as exchanges and clearinghouses.

Information Security Practices and Procedures

Asif Yahiya Sukri limits access to personal information to authorized firm employees or agents and, as described above in Disclosing Personal Information, our service providers are held to stringent standards of privacy. Asif Yahiya Sukri maintains physical, electronic and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure. Some of the other central features of our information security program are:

- A dedicated group – the Information Security Department – that designs, implements and provides oversight to our information security program;
 - The use of specialized technology such as firewalls;
 - Testing of the security and operability of products and services before they are introduced to the Internet, as well as ongoing scanning for publicly known vulnerabilities in the technology;
 - Internal and external reviews of our Internet sites and services;
 - Implementing controls to identify, authenticate and authorize access to various systems or sites;
 - Monitoring of our systems infrastructure to detect weaknesses and potential intrusions;
 - Implementing controls to identify, authenticate and authorize access to various systems or sites;
 - Protecting information during transmission through various means including, where appropriate, encryption; and
 - Providing Asif Yahiya Sukri personnel with relevant training and continually updating our security practices in light of new risks and developments in technology.
- Our security practices and procedures are commensurate with the information assets being protected by similar companies in the nature of business that we are in.

Grievances

Should you have any grievances about the processing of your personal information, you may contact Jazib Sukri (jazib@aysasia.com) who has been designated as the Asif Yahiya Sukri Grievance Officer for this purpose.