PRIVACY POLICY

WEBSITE: WWW.LSPOWERCONTROL.COM

	Detail
Data Fiduciary	L.S. Power Control Private Limited ("LS Power Control")
CIN	U31401HR2014PTC053287
Registered Office	Plot No. 440, 441, 442 & 443, Block-C, Ansal Pioneer Industrial Park, Bilaspur, Tehsil Manesar, Bilaspur Chowk, Gurugram, Haryana – 122413
Corporate Office	Office No. 315, 3rd Floor, DLF Prime Tower, Okhla Phase-I, New Delhi – 110020
Branch Address	Unit 1: C440-443, Ansal Pioneer Industrial Park, Bilaspur, Gurugram, Haryana 122413 Unit 2: LS Industrial Park, Ansal Pioneer Industrial Park, Bilaspur, Gurugram, Haryana 122413
Website	https://www.lspowercontrol.com
Policy Version	1.4 (Final)
Effective Date	07/11/2026
Last Updated	07/11/2026
Approved by	Mr. Ashish Kumar Yadav (Director)

1. Introduction

L.S. Power Control Private Limited ("**LS Power Control**", the "**Company**", "**we**", "**us**"), a manufacturer of MV/LV switchboards and electrical panels, package substations, bus ducts and switchgear and an EPC contractor, respects your privacy. This Privacy Policy (the "**Policy**") explains how we collect, use, share, store, protect, retain and erase personal data received through **www.lspowercontrol.com** (the "**Website**") and related channels, and how you can exercise your rights.

This Policy is published under Sections 5 and 8(9) of the Digital Personal Data Protection Act, 2023 (No. 22 of 2023) ("**DPDP Act**") read with Rules 3 and 9 of the Digital Personal Data Protection Rules, 2025 [G.S.R. 846(E), dated 13 November 2025] ("**DPDP Rules**"), and Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 [G.S.R. 313(E), dated 11 April 2011] ("**SPDI Rules**"), framed under Section 43A read with Section 87(2)(ob) of the Information Technology Act, 2000 (No. 21 of 2000) ("**IT Act**"). The Company is the "Data Fiduciary" (Section 2(i)) and you are the "Data Principal" (Section 2(j)). By using the Website you acknowledge this Policy; where consent is required, we seek it separately through a clear affirmative action, such as ticking an unticked check-box.

2. Definitions and Abbreviations

Terms not defined below have the meanings given in the DPDP Act. the Rules or the IT Act.

2.1 Definitions

Term	**Meaning**	**Reference**

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Term	Meaning	Reference
Personal Data	Any data about an individual who is identifiable by or in relation to such data.	Sec. 2(t), DPDP Act
Data Principal / "you"	The individual to whom the data relates; for a child or a person with disability, includes the parent or lawful guardian.	Sec. 2(j), DPDP Act
Data Fiduciary	The person who determines the purpose and means of processing – here, the Company.	Sec. 2(i), DPDP Act
Data Processor	A person who processes personal data on the Company's behalf (e.g. hosting, e-mail, CRM, ERP or IT providers).	Sec. 2(k), DPDP Act
Processing	Any wholly or partly automated operation on digital personal data, including collection, recording, storage, use, sharing, disclosure, restriction, erasure or destruction.	Sec. 2(x), DPDP Act
Personal Data Breach	Any unauthorised processing, accidental disclosure, acquisition, sharing, use, alteration, destruction or loss of access to personal data that compromises its confidentiality, integrity or availability.	Sec. 2(u), DPDP Act
Child	An individual who has not completed eighteen (18) years of age.	Sec. 2(f), DPDP Act
Consent Manager	A person registered with the Board through whom a Data Principal can give, manage, review and withdraw consent.	Sec. 2(g) & 6(7)–(9), DPDP Act; Rule 4, DPDP Rules
Board	The Data Protection Board of India.	Sec. 2(c) & 18, DPDP Act
Appellate Tribunal	The Telecom Disputes Settlement and Appellate Tribunal, which hears appeals against orders of the Board.	Sec. 2(a) & 29, DPDP Act
Sensitive Personal Data or Information (SPDI)	Passwords; financial information such as bank account, credit or debit card details; physical, physiological and mental health condition; sexual orientation; medical records and history; biometric information.	Rule 3, SPDI Rules

2.2 Abbreviations

Abbreviation	Full Form
DPDP Act	Digital Personal Data Protection Act, 2023 (No. 22 of 2023)
DPDP Rules	Digital Personal Data Protection Rules, 2025 [G.S.R. 846(E), dated 13 November 2025]
IT Act	Information Technology Act, 2000 (No. 21 of 2000)
SPDI Rules	Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 [G.S.R. 313(E), dated 11 April 2011]
CERT-In	Indian Computer Emergency Response Team under Section 70B of the IT Act
CERT-In Directions	Directions No. 20(3)/2022-CERT-In, dated 28 April 2022, issued under Section 70B(6) of the IT Act



Abbreviation	Full Form
CERT-In Rules	Information Technology (The Indian Computer Emergency Response Team and Manner of Performing Functions and Duties) Rules, 2013 [G.S.R. 20(E), dated 16 January 2013]
BNSS	Bharatiya Nagarik Suraksha Sanhita, 2023 (No. 46 of 2023)
TCCCPR	Telecom Commercial Communications Customer Preference Regulations, 2018 (TRAI)
ERP	The Company's Enterprise Resource Planning system

3. Scope and Applicability

This Policy applies to digital personal data (including data collected in non-digital form and digitised later) that we process within India through: (a) the Website, including its Contact Us, Purchase Inquiry, Customer Care, Export Inquiry and Career pages, forms and upload facilities; (b) e-mails, calls and WhatsApp messages sent to contacts published on the Website (such as estimation@, exports@, service@ and hr@lspowercontrol.com); (c) business cards and enquiries received at exhibitions, seminars and meetings; and (d) cookies and server logs.

It does **not** apply to: (a) employees' personal data, governed by the internal HR privacy notice; (b) data processed under a separate contract or notice with a customer, vendor or partner, to the extent it provides otherwise; (c) personal data we process **on behalf of a customer** (for example, resident or consumer details in meter-board schedules, or site-personnel lists), where we act as the customer's Data Processor under the contract; (d) visitor registers, CCTV and factory-acceptance-test attendance at our premises, covered by a separate notice; and (e) third-party websites (Section 17).

4. Personal Data We Collect

We collect only the personal data necessary for the purpose for which it is provided:

Category	Examples of Personal Data	Collected Through
Identity & contact details	Name, e-mail, mobile/telephone number, company, designation, city, state and country.	All Website forms; e-mail; phone; WhatsApp; business cards
Enquiry & business details	Product/service requirement, project name and location, quantities, technical specifications, uploaded drawings or documents, and message contents.	Purchase Inquiry, Export Inquiry, Contact Us
Customer-care details	Customer/project/order reference, site address, nature of complaint or service request, photographs or reports shared.	Customer Care page; service@ e-mail
Recruitment details	CV / résumé, qualifications, work experience, current and expected compensation, notice period, references and other application details.	Career page / form; hr@ e-mail
Technical & usage data	IP address, browser and version, device and operating system, date and time of visit, pages viewed, referring URL and cookie identifiers.	Automatically, via server logs and cookies

We do not seek Sensitive Personal Data or Information (Rule 3, SPDI Rules – e.g. passwords, bank or card details, health, sexual orientation, medical or biometric data) or Aadhaar / PAN through the Website; please do not include them in messages or attachments. Bank details, GSTIN or PAN needed for orders, invoicing or payments are collected later under the relevant contract. Any SPDI needed later (e.g. on-boarding a selected candidate) is collected with a specific notice and written (including electronic) consent.

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Data of other persons: If you give us personal data of another individual (such as colleagues, site contacts, consultants or referees), you confirm that you are authorised to share it and have informed that individual of this Policy.

We take reasonable steps to ensure that the personal data we process is complete, accurate and consistent. If you tell us your data is inaccurate or misleading, we will correct, complete or update it under Section 12.

5. How We Collect Personal Data

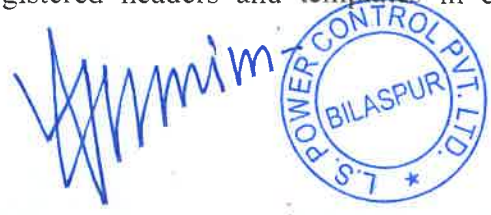
Only for a lawful purpose connected with your request: **directly from you** (forms, uploads, e-mail, calls, WhatsApp, business cards); **automatically** (server logs and cookies – Section 9); and **from third parties** (recruitment agencies or job portals you have registered with; referrals from customers, consultants or channel partners). Enquiries may be recorded in our ERP, CRM or e-mail systems so that the relevant department (sales/estimation, exports, customer care or HR) can track and answer them.

6. Purposes and Lawful Basis of Processing

We process personal data only on a ground under Section 4 of the DPDP Act: **consent** (Section 6 – free, specific, informed, unconditional and unambiguous, by clear affirmative action, after notice under Section 5 and Rule 3 of the DPDP Rules), or **legitimate uses** under Section 7 – Section 7(a) (data you voluntarily provide for a specified purpose without indicating objection) and Sections 7(d) and 7(e) (compliance with law and with any judgment, decree or order).

Purpose	Lawful Basis	Reference
Answering enquiries; quotations and techno-commercial offers; follow-up	Voluntary provision for the specified purpose; or consent	Sec. 4(1), 6 & 7(a), DPDP Act
Recording enquiries in ERP / CRM; creating and maintaining customer, vendor and order records where an enquiry leads to a quotation, order or business relationship	Voluntary provision; retention as required by law	Sec. 7(a) & 8(7), DPDP Act
Customer-care / after-sales service requests and complaints	Voluntary provision for the specified purpose	Sec. 7(a), DPDP Act
Export enquiries and related correspondence	Voluntary provision; or consent	Sec. 6 & 7(a), DPDP Act
Evaluating job applications, interviews and recruitment communication	Consent	Sec. 6, DPDP Act
Newsletters, product updates, event invitations and other promotions	Separate, specific consent (withdrawable anytime)	Sec. 6(1) & 6(4), DPDP Act; TCCCPR
Website security; preventing spam, fraud and misuse; keeping logs	Obligation to maintain security safeguards and logs	Sec. 8(5), DPDP Act; Rules 6 & 8(3), DPDP Rules; CERT-In Directions
Legal and regulatory compliance, court orders, lawful requests of authorities; establishing or defending legal claims	Legitimate uses and exemptions under law	Sec. 7(d), 7(e) & 17(1)(a), DPDP Act

We do not use personal data for any other purpose unless you consent or the law permits; a materially different purpose will need a fresh notice and. where required, consent. Promotional SMS and voice calls are made only with consent and through registered headers and templates in compliance with the TCCCPR.



7. Notice and Consent

Each Website form carries its own notice, presented in clear and plain language and understandable on its own, before or with the request for consent. That notice gives, at a minimum: (a) an itemised description of the personal data to be processed; (b) the specified purpose or purposes of the processing and the goods or services to be provided or uses to be enabled by it; and (c) the link to this Policy on our Website. Where consent is the basis, the form uses an unticked check-box. Marketing consent is a separate, optional check-box and is never a condition for submitting an enquiry. We keep a record of each notice and consent given.

Withdrawal: You may withdraw consent at any time, as easily as you gave it, by writing to the Grievance Officer (Section 18) or using the "unsubscribe" link. Processing before withdrawal remains lawful; after it, we and our Data Processors will stop processing within a reasonable time unless retention is required by law. Withdrawing recruitment consent ends consideration of your application.

Sensitive data: where ever required, consent is taken in writing (including electronically) and you are told the purpose and intended recipients. **Language:** this Policy and any notice are available on request in English or any language in the Eighth Schedule to the Constitution of India. **Consent Managers:** you may also give, manage, review or withdraw consent through a Consent Manager registered with the Board, once operational.

8. Disclosure and Sharing of Personal Data

We do not sell, rent or trade personal data. We share it only on a need-to-know basis with:

- **Authorised personnel** in sales, estimation, projects, export, customer care, HR and IT, bound by confidentiality;
- **Data Processors** – website hosting and maintenance, e-mail, form-management, CRM, cloud-storage and IT-security providers, and the ERP provider and its implementation / support partner – engaged under a valid contract, acting only on our instructions and applying reasonable security safeguards;
- **OEM / technology licensors and authorised channel partners** (for products made under licence), only as needed for your enquiry, order or warranty, with consent where required;
- **Project and order execution parties** – your consultants and EPC contractors, third-party inspection agencies, testing laboratories, statutory electrical authorities (such as the Electrical Inspectorate and electricity distribution utilities, for approvals and energisation) and, for exports, freight forwarders, customs brokers, banks and insurers;
- **Professional advisers** (auditors, lawyers, consultants) under confidentiality;
- **Government, regulatory, judicial or law-enforcement authorities** where required or permitted by law, including under Sections 7(d), 7(e) and 17(1)(c) of the DPDP Act, Sections 69 and 69B of the IT Act, Section 94 of the BNSS and the proviso to Rule 6(1) of the SPDI Rules; and
- **A successor entity** on merger, amalgamation, demerger or transfer of business, subject to law.

Otherwise, we do not disclose personal data to a third party without your prior permission. Disclosure of personal information in breach of a lawful contract is punishable under Section 72A of the IT Act.

9. Cookies and Similar Technologies

Category	Purpose	Consent
Strictly necessary	Core functions such as page navigation, security and load balancing.	Not required – cannot be disabled
Functional	Remember preferences and improve experience.	Required

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Category	Purpose	Consent
Analytics / performance	Understand Website use (e.g. Google Analytics, if enabled).	Required
Third-party embedded content	Google Maps, Google Fonts, YouTube videos and the WhatsApp chat button may set their own cookies or collect your IP address.	Required (or governed by the third party's own policy)

Non-essential cookies that process personal data are placed only after notice and your consent through the cookie banner, which you can change anytime via "Cookie Settings" in the footer or your browser settings (some features may then not work). Our cookie inventory is available on request.

10. Storage and Transfer of Personal Data Outside India

Personal data is stored in systems operated by the Company or its Data Processors – the ERP, CRM, e-mail servers and website hosting environment. Access to ERP data is restricted by user roles and permissions to employees who need it. The ERP is hosted **[on-premises at the Company's premises / on cloud servers located in India]**.

Some service providers and OEM / technology partners may store or process data outside India. Transfers are made only to countries not restricted by the Central Government under Section 16 of the DPDP Act, subject to Rule 15 of the DPDP Rules and, until 13 May 2027, Rule 7 of the SPDI Rules (the recipient must ensure the same level of data protection).

11. Retention and Erasure

We keep personal data only as long as needed for the specified purpose or as required by law, and erase it (and require our Data Processors to erase it) once you withdraw consent or the purpose is no longer served, unless the law requires retention:

Type of Data	Retention Period	Basis
Enquiries that do not result in a contract	Up to 3 years from last communication	Limitation Act, 1963 (No. 36 of 1963)
Enquiries resulting in an order / contract, and related customer, vendor and order records in the ERP	Up to 8 years from the end of the financial year in which the contract is completed	Sec. 128(5), Companies Act, 2013 (No. 18 of 2013); Sec. 35 & 36, CGST Act, 2017 (No. 12 of 2017)
Customer-care / warranty records	Warranty or service period plus 3 years	Contractual and limitation requirements
Unsuccessful job applications	12 months from application (longer only with consent)	Sec. 8(7), DPDP Act
Marketing preferences	Until consent is withdrawn or you unsubscribe	Sec. 6(4), DPDP Act
Logs and related personal data of processing	At least 1 year	Rules 6(1)(e) & 8(3), DPDP Rules
ICT system logs	180 days, maintained within India	Direction (iv), CERT-In Directions

The fixed erasure periods and forty-eight (48) hour prior intimation in Rule 8 and the Third Schedule of the DPDP Rules apply only to specified classes (large e-commerce entities, online gaming intermediaries and social media intermediaries); the Company is not presently within them. Section 8(7) of the DPDP Act and the periods above apply.

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12. Reasonable Security Safeguards

We maintain reasonable security safeguards, including for processing by our Data Processors:

- encryption in transit (HTTPS/TLS) and, where appropriate, at rest; masking or obfuscation where feasible;
- role-based access (including ERP user roles and permissions), strong authentication and least privilege;
- logging and monitoring of access, with logs retained for at least one year;
- regular backups, malware protection, patching of the Website platform and plug-ins, and vulnerability assessments;
- employee confidentiality obligations; Data Processor contracts requiring prompt reporting of breaches to us; and handling of enquiries only on Company-managed devices and business e-mail / WhatsApp accounts; and
- periodic review against recognised standards such as IS/ISO/IEC 27001.

No method of internet transmission or electronic storage is completely secure, and absolute security cannot be guaranteed.

13. Personal Data Breach

On becoming aware of a personal data breach, the Company will act under applicable law, its contracts and its incident-response procedure, and will:

- inform each affected Data Principal without delay, in clear and plain language, of the nature, extent, timing and location of the breach, its likely consequences, mitigation measures taken, safety measures you may take, and a contact person for queries;
- inform the Board without delay and furnish a detailed report within seventy-two (72) hours of becoming aware of the breach (or such longer period as the Board allows); and
- report notifiable cyber-security incidents to CERT-In within six (6) hours of noticing them, under the CERT-In Directions read with Rule 12 of the CERT-In Rules.

14. Your Rights

Subject to applicable law, you have the following rights.

14.1 Rights Available to You

Right	What it means	Reference
Access information	A summary of your personal data and processing, and the identities of Data Fiduciaries and Data Processors with whom it was shared, with a description of the data shared.	Sec. 11, DPDP Act
Correction & erasure	Correction of inaccurate or misleading data, completion, updating, and erasure when no longer necessary (unless law requires retention).	Sec. 12, DPDP Act; Rule 5(6), SPDI Rules
Withdraw consent	At any time, as easily as it was given.	Sec. 6(4), DPDP Act; Rule 5(7), SPDI Rules
Grievance redressal	Grievance addressed by the Company, and thereafter by the Board.	Sec. 13, DPDP Act; Rule 5(9), SPDI Rules
Nominate	Nominate another individual to exercise your rights on your death or incapacity.	Sec. 14, DPDP Act

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14.2 How to Exercise Your Rights

Write to the Grievance Officer (Section 18) with the subject "Data Protection Request", giving your name, the e-mail or mobile number you used with us and the right you wish to exercise. We may verify your identity. We will acknowledge within [5] working days and respond to a request to access, correct, update or erase your personal data within thirty (30) days. A grievance will be resolved within thirty (30) days of receipt, which is within the ninety (90) day outer limit for grievance response under Rule 14(3) of the DPDP Rules (in force from 13 May 2027); until then, the one-month period in Rule 5(9) of the SPDI Rules applies.

14.3 Escalation to the Data Protection Board of India

If not satisfied, you may, after exhausting our grievance-redressal mechanism, complain to the Board (constituted under Section 18) under Section 27 of the DPDP Act; appeals against the Board's orders lie to the Appellate Tribunal under Section 29.

15. Your Duties

You must comply with applicable law, not impersonate another person, not suppress material information, not register a false or frivolous grievance or complaint, and furnish only verifiably authentic information when seeking correction or erasure. Breach may attract a penalty of up to ₹10,000.

16. Children and Persons with Disability

A "child" is an individual who has not completed eighteen (18) years (Section 2(f)). The Website is for business and informational purposes, is not directed at children, and we do not knowingly collect children's data. If a child's data must be processed (for example, an apprentice applicant through the Career page), we will first obtain the verifiable consent of the parent or lawful guardian, and will not undertake processing likely to harm a child's well-being, or tracking, behavioural monitoring or targeted advertising directed at children. A child's data received without such consent will be erased promptly. For a person with disability who has a lawful guardian, we obtain the guardian's verifiable consent.

17. Third-Party Websites and Services

The Website links to or integrates third-party services such as WhatsApp, LinkedIn, Facebook, Instagram, YouTube, Google Maps and product catalogues or microsites hosted by third parties. These parties collect data under their own privacy policies and are responsible for their own compliance; please read their policies. WhatsApp messages are also processed by WhatsApp / Meta under its terms. Where a third-party service or microsite collects enquiries on the Company's behalf, it is engaged as a Data Processor under Section 8.

18. Grievance Officer and Contact for Privacy Queries

Under Sections 8(9) and 8(10) of the DPDP Act, Rule 9 of the DPDP Rules and Rule 5(9) of the SPDI Rules, the Company has designated:

Particular	**Detail**
Name	Mr. Vikash Panghal
Designation	HR. Assistant Manager
E-mail	**privacy@lspowercontrol.com**
Telephone	**[+91 9643209591]** (Monday to Saturday, 10:00 a.m. to 6:00 p.m. IST)
Address	L.S. Power Control Private Limited, Plot No. 440, 441, 442 & 443, Block-C, Ansal Pioneer Industrial Park, Bilaspur, Tehsil Manesar, Bilaspur Chowk, Gurugram, Haryana - 122413
Subject line	Privacy / Data Protection Request

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Grievances are acknowledged within **[5]** working days and resolved within thirty (30) days of receipt; these contact details are also given in every response to a rights request. You may then approach the Board as described in Section 14.3.

19. Changes to this Policy

Updates will be published on this page with a revised "Last Updated" date and version number. For material changes we will display a prominent notice on the Website and, where required, seek fresh consent before applying them to data already collected.

20. Governing Law

This Policy is governed by the laws of India, including the DPDP Act, the DPDP Rules, the IT Act and the rules made under it. The DPDP Act and DPDP Rules are commencing in phases: most Data Fiduciary obligations (Sections 3 to 17 of the DPDP Act; Rules 3 and 5 to 16 of the DPDP Rules) take effect on 13 May 2027. Until then, Sections 43A and 72A of the IT Act and the SPDI Rules apply; Section 43A, and with it the SPDI Rules, stands omitted from 13 May 2027 under Section 44(2) of the DPDP Act. This Policy complies with both regimes. Where the data-protection law of another country applies to the Company in respect of an export enquiry, we will also comply with it. Annexure A summarises the provisions referred to.

21. Jurisdiction

Disputes arising out of this Policy or the processing of personal data through the Website are subject to the exclusive jurisdiction of the competent courts at Gurugram, Haryana, India, subject to Section 39 of the DPDP Act, under which no civil court has jurisdiction over matters the Board is empowered to decide. Such matters, including complaints about breaches or our response to a request or grievance, are dealt with by the Board under Section 27, with appeals to the Appellate Tribunal under Section 29. Nothing here limits your right to approach the Board or any other statutory authority.

For L.S. Power Control Private Limited

L.S. POWER CONTROL PVT. LTD. BILASPUR

Authorised Signatory
Name: Ashish Kumar Yadav
Designation: Director
Date: 07/11/2026