



**The Balasore Bhadrak Central Co-operative Bank Ltd.**  
**Head Office: O.T. Road, Balasore-756001**

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**Data Protection Policy for Balasore Bhadrak Central Co-operative Bank (BBCCB)**

## **1. Purpose**

The purpose of this Data Protection Policy is to outline the measures Balasore Bhadrak Central Co-operative Bank (BBCCB) has adopted to ensure the protection of personal data, including Aadhaar data, in compliance with applicable legal and regulatory requirements. This policy addresses data protection provisions under the **Aadhaar Act**, the **Information Technology Act, 2000**, and the **Digital Personal Data Protection Act, 2023 (DPDP Act)**, as well as the **Sensitive Personal Data or Information (SPDI) Rules** until the DPDP Act comes into force.

This policy applies to all employees, contractors, third-party vendors, and stakeholders who handle, process, or store personal data and is intended to guide BBCCB in complying with legal obligations, protecting customer privacy, and ensuring the security of personal data.

## **2. Scope**

This policy applies to the following:

- All personal data collected, stored, processed, or transmitted by BBCCB, including Aadhaar data and any other sensitive personal data or information (SPDI).
- All systems, processes, and platforms within BBCCB that interact with personal data.
- Employees, contractors, third-party service providers, and any other stakeholders involved in handling personal data.

The policy is designed to comply with the following legal frameworks:

1. **Aadhaar Act, 2016** and UIDAI regulations and standards.
2. **Information Technology Act, 2000 (IT Act)** and its associated rules.
3. **Sensitive Personal Data or Information (SPDI) Rules, 2011** (till the coming into force of the DPDP Act).
4. **Digital Personal Data Protection Act, 2023 (DPDP Act)**, upon its enactment.

## **3. Legal and Regulatory Compliance**

BBCCB is committed to ensuring compliance with all applicable data protection laws and regulations. The following key legal frameworks form the basis for our data protection practices:

### **3.1 Aadhaar Act, 2016 & UIDAI Regulations**

- BBCCB ensures compliance with the **Aadhaar Act, 2016**, and the regulations issued by the Unique Identification Authority of India (UIDAI), which govern the collection, storage, processing, and use of Aadhaar data.
- BBCCB will adhere to UIDAI standards and specifications to ensure the protection of Aadhaar data, including encryption, access control, and audit trails, and incident response.
- The **Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits, and Services) Act, 2016** lays down provisions for security measures relating to Aadhaar data, including guidelines for sharing and processing Aadhaar data.



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### **3.2 Information Technology Act, 2000 (IT Act)**

- The **Information Technology Act, 2000** provides the legal framework for data protection in India, addressing **cybercrimes, data security, and privacy**.
- BBCCB will comply with the provisions under the **IT Act** and ensure the protection of **Sensitive Personal Data or Information (SPDI)**, as defined under the **SPDI Rules, 2011**.
- BBCCB will implement adequate **reasonable security practices and procedures** for the protection of data from unauthorized access, disclosure, alteration, or destruction.

### **3.3 Sensitive Personal Data or Information (SPDI) Rules, 2011**

- Until the enactment of the **DPDP Act, 2023**, BBCCB will comply with the **Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (SPDI Rules)**.
- The SPDI Rules specify security and privacy measures that must be followed when processing sensitive personal data, which includes Aadhaar data.
- BBCCB will adhere to the guidelines under the SPDI Rules for obtaining consent, security safeguards, and data retention.

### **3.4 Digital Personal Data Protection Act, 2023 (DPDP Act)**

- Upon the coming into force of the **DPDP Act, 2023**, BBCCB will align its practices with the new regulations under the Act, ensuring protection of personal data as required by the law.
- The DPDP Act emphasizes transparency, accountability, and data subject rights, and BBCCB will ensure compliance with its provisions concerning consent, data retention, data access, and rectification rights.

## **4. Data Protection Principles**

BBCCB is committed to upholding the following data protection principles:

1. **Lawful, Fair, and Transparent Processing:** Personal data will be collected and processed lawfully, fairly, and in a transparent manner. Data will be used only for specified, legitimate purposes.
2. **Purpose Limitation:** Personal data will be collected only for specific, legitimate purposes related to BBCCB's business functions and will not be processed for incompatible purposes.
3. **Data Minimization:** Only the minimum necessary personal data will be collected and retained, ensuring that data is relevant and adequate for its intended purpose.
4. **Accuracy:** BBCCB will take reasonable steps to ensure that personal data is accurate and up-to-date. Data subjects will have the right to rectify their personal data if it is inaccurate or incomplete.
5. **Storage Limitation:** Personal data will be retained for no longer than necessary to fulfil the purposes for which it was collected or as required by law.
6. **Security of Personal Data:** BBCCB will implement appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, and destruction, including encryption, access controls, and monitoring systems.
7. **Data Subject Rights:** BBCCB will ensure that data subjects (individuals whose data is processed) can exercise their rights, including the right to access, correct, delete, and restrict processing of their data, as stipulated under the applicable laws.

## **5. Data Collection and Consent**



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- **Consent:** BBCCB will obtain explicit, informed consent from individuals before collecting, processing, or storing their personal data, including Aadhaar data. The consent will be specific, informed, and freely given.
- **Data Minimization:** Only the necessary data required for legitimate business purposes will be collected.
- **Withdrawal of Consent:** Individuals will have the right to withdraw their consent at any time, and BBCCB will ensure that such requests are processed promptly.

### **6. Data Security Measures**

BBCCB will implement appropriate security measures to protect personal data:

1. **Encryption:** Personal data, including Aadhaar data, will be encrypted both at rest and in transit using industry-standard encryption algorithms (e.g., AES-256).
2. **Access Control:** Access to personal data will be granted on a need-to-know basis, with role-based access controls in place to limit unauthorized access.
3. **Regular Audits and Monitoring:** Regular audits of data access and processing activities will be conducted to ensure compliance with security standards and identify potential risks.
4. **Incident Response Plan:** A clear incident response plan will be implemented to address any data breaches or unauthorized access to personal data.

### **7. Data Retention and Disposal**

- **Data Retention:** Personal data will be retained only for as long as necessary to fulfil its intended purpose or as required by law.
- **Data Disposal:** Once the data is no longer required, BBCCB will ensure that it is securely deleted or anonymized to prevent unauthorized access.

### **8. Third-Party Data Sharing**

- BBCCB will ensure that third-party vendors or service providers who process personal data on behalf of the bank comply with this data protection policy and adhere to required security and privacy standards.
- **Data Processing Agreements** will be established with third-party vendors to ensure compliance with data protection obligations and security measures.
- BBCCB will perform due diligence assessments on third-party service providers and vendors to ensure that they adhere to the same data protection standards.

### **9. Privacy Impact Assessments (PIA)**

- **PIAs** will be conducted whenever a new project, system, or process is introduced that could impact the privacy and security of personal data. These assessments will evaluate risks related to the processing of personal data and identify necessary mitigation actions.

### **10. Training and Awareness**

- All employees, contractors, and relevant stakeholders will receive regular training on data protection, privacy rights, and the bank's data protection policies and procedures.
- Regular security awareness campaigns will be conducted to keep employees informed about the importance of data protection and privacy.

### **11. Policy Review and Updates**



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This Data Protection Policy will be reviewed annually or whenever there are significant changes in legal or regulatory requirements. Any changes will be communicated to relevant stakeholders, and the updated policy will be published on the BBCCB website.

### **12. Policy Publication**


This policy will be published on the official BBCCB website. The URL for the policy is:

[<https://www.bbccbbalasore.com/>]

### **13. Conclusion**

BBCCB is committed to protecting the personal data of its customers and ensuring compliance with all applicable data protection laws and regulations. This policy establishes the principles and practices required to ensure that personal data, including Aadhaar data, is handled in a secure and compliant manner.

**Approved By:**

  
**Chief Executive Officer**

  
**Chief Information  
Security Officer (CISO)**

### **References:**

1. Aadhaar Act, 2016
2. UIDAI Security Guidelines (v4.0)
3. Information Technology Act, 2000 (IT Act)
4. Sensitive Personal Data or Information (SPDI) Rules, 2011
5. Digital Personal Data Protection Act, 2023 (DPDP Act) (Once enacted)