

Workplace Monitoring Policy



A. INTRODUCTION

1. The activities at the workplace has assumed significant importance owing to several ramifications thereof, both for the employer as well as the employee. Therefore it is felt necessary that the Workplace Monitoring Policy be implemented so as to safeguard and protect the trade secrets, proprietary and confidential information of the employer on the one hand and to detect and dissuade improper behavior such as sexual harassment, fraud, theft, embezzlement, identity theft and data breaches to deal with the employee on the other.
2. This policy addresses the different aspects, facets and dimensions related to monitoring of activities at the workplace so as to make them ascertainable and predictable.

This policy shall be read and understood harmoniously in conjunction with other policies and guidelines on subjects indicated in the document.

B. OBJECTIVE

The objectives of this Policy for the time being in force are as under:

- to comply with statutory or regulatory obligations that require the employer to monitor the activities at the workplace;
- to ensure the safety of employees, protect NIIT's assets, both tangible as well as intangible;
- to enforce standards of behavior and decorum at the workplace in accordance with NIIT Code of Conduct and other policies;
- to prevent liability to the extent of employer's responsibility for the acts and omissions of the employee;
- to manage workplace productivity, service quality control or enforcement of company policies

C. SCOPE

This Preventive Employee Monitoring Policy is applicable to all NIITians on regular roles including interns and trainees, Retainer or contractual modes of engagements, consultants and those on third party roles including visitors to the workplace.

D. POLICY

The monitoring shall be carried out by all means available to NIIT which may include, without limitation:

1. auditing, monitoring or accessing email accounts, emails, instant messaging or voice mail in accordance with the applicable policies except the sensitive personal data or information as defined under Section 43(A) of the Information Technology Act, 2000 and Rule 3 of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 or the General Data Protection Regulation, EU, if so applicable.

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2. accessing physical files/documents under the possession of a person;
3. accessing the work computer, computing resources or computing devices;
4. accessing records of internet usage (including sites and pages visited, files downloaded, video and audio files accessed and data input); and
5. video surveillance.

E. Computer Resources and Computer Network Monitoring

1. A person working at the workplace may either be using the Computer Resource and Computer Network or both of NIIT. NIIT shall monitor the Computer Resource and/or Computer Network being used by such person in terms of the applicable policy or policies of NIIT.
2. Use of NIIT's Computer Network by a visitor constitutes consent to monitoring

F. Video Surveillance

In order to further strengthen the security and safety at the workplace, NIIT may install cameras for video surveillance within the workplace except those areas where privacy is required, with necessary signage informing the employees of the area being under CCTV as also have cameras visibly placed. The video recording will be stored for a period of 30 days. Video feeds shall be stored with restricted access or retrieved by a high level of authorized member only, strictly for a legitimate purpose related to employment or business activities. The data of the video recording shall be in the custody of the Head of CSO.

G. Physical Monitoring

1. NIIT desires to maintain a work environment that is free of narcotic substances, alcohol, firearms, explosives, or other improper materials. To this end, the Company prohibits the control, possession, transfer, sale, or use of such materials on its premises to the extent permitted
2. Desks, lockers, and other storage devices are provided for the convenience of employees but remain the sole property of the Company and can be searched and seized as and when the need arises. The articles found within them, can be inspected by the authorized representative of the Company at any time, either with or without prior notice.

H. Access Monitoring

Access to the office premises including NIIT Centers is monitored via access card and the magnetic strip thereof. This data is also retained for a substantial period with limited access for retrieval. The access data will be in the custody of Head of TSO.

I. Visitor Monitoring

1. NIIT prohibits unescorted visitors in its facilities. In case an employee is expecting visitors, they must request permission from their manager. All visitors to NIIT facilities will be required to wear a "Visitor's Badge" to enter the building beyond the lobby area. This includes all former employees, friends, family members and vendors.
2. Any monitoring records made as a result of the preventive Workplace monitoring will not be used or disclosed unless:
 - required for a legitimate purpose related to employment or business activities or functions;

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- required to be presented to law enforcement agencies;
 - they relate to civil or criminal proceedings;
 - necessary in order to avert an imminent threat, serious violence to persons or substantial damage to property
3. NIIT may undertake one or more of these measures in case of :
- restrict access to internet facilities and/or sites of any kind;
 - prevent the sending and/or receiving of emails; and
 - disclose any data it collects through monitoring and auditing activities to support Company policy or law enforcement

J. MONITORING & REVIEW OF POLICY

The HR shall conduct a yearly review of Employee Privacy Monitoring Policy. The reviews should include adequacy and effectiveness of the Monitoring methodology, threat vulnerability with regard to any identified significant changes in the organization, changes in technology, change in business objectives and processes regulatory environment.

NIIT reserves the right to amend this policy at its discretion. In case of amendments, users will be informed appropriately.

REVISION DETAILS: Reference to any other liked procedure/policy/legal requirement etc., as applicable.

S.No	Release Date	Version No.	Brief Description of Change	Done by	Approved by
1	01-July-19	1	Baseline version	Chitra Mondal	K V Radhakrishnan
2	01-Apr-23	2	Policy Update	Chitra Mondal	Sushil Kumar Behera