BITS Pilani
Mumbai Campus

Data Privacy Policy for Personal Authentication Data Processing at BITS Pilani Mumbai Campus

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Data Privacy Policy for Personal Authentication Data Processing at BITS Pilani Mumbai Campus

1. OBJECTIVE

This policy establishes guidelines for the collection, processing, storage, and security of Personal Authentication Data (including Biometric and Facial Recognition Information) data at BITS Pilani Mumbai Campus. It is aligned with the provisions of the Digital Personal Data Protection Act, 2023 (DPDPA) to ensure compliance with privacy and data protection laws in India.

2. SCOPE

This policy applies to all students, faculty (both regular and visiting), staff (regular / part-time / contractual) whose personal data is collected and processed by the BITS Pilani Mumbai Campus for authentication purposes ("Personal Authentication Data). This policy covers aspects such as data collection and purpose, consent mechanism, data storage and security, data access and retention, rights of data principals (individuals) and compliance and accountability.

3. COLLECTION AND PURPOSE OF PERSONAL AUTHENTICATION DATA

BITS Pilani Mumbai Campus may collect Personal Authentication Data, including fingerprint scans, facial recognition images, Library/ID cards, email, etc. strictly for the following purposes:

3.1 **Campus Security & Access Control:** To ensure secure access to BITS Pilani Mumbai Campus premises, hostels and restricted areas.

3.2 **Attendance & Academic Records:** For authentication and verification in academic settings, including examinations, library access and attendance tracking.

3.3 **Identity Verification:** For administrative purposes such as issuing ID cards, controlling fraudulent activities and ensuring accurate record-keeping.

4. CONSENT MECHANISM

4.1 Personal authentication data will only be collected with the explicit and informed consent of the data principal (individual whose data is collected).

4.2 Consent will be obtained through a written or digital consent form that clearly outlines the purpose of processing and rights of the Data Principal.

4.3 Individuals have the right to withdraw consent at any time by sending an email to Data Protection Officer. The application will be evaluated in accordance with BITS Pilani

Mumbai Campus policy and the same shall be communicated to Data Principal, Provided that BITS Pilani Mumbai Campus may continue processing and/or storing certain personal authentication data where, (i) it is permitted to do so under the DPDPA, such as, when processing of personal data is required to protect the employer against loss or liability; and (ii) it has an obligation to do so under any law for the time being in force.

4.4 For individuals below 18 years of age, consent must be given by their parents or legal guardians.

5. DATA STORAGE AND SECURITY MEASURES

5.1 Personal Authentication Data will be stored securely in encrypted format to prevent unauthorized access, misuse, or data breaches under the direct control of DPO.

5.2 Data will be stored in a restricted-access server within India.

5.3 Multi-layered security protocols, including firewalls, encryption and role-based access control will be implemented to safeguard the sensitive personal data elements present in the personal authentication data.

5.4 Any third-party service provider handling personal authentication data on behalf of the BITS Pilani Mumbai Campus will be required to undergo a mandatory technical security assessment and sign a Data Processing Agreement (DPA) and Non-Disclosure Agreement (NDA) ensuring compliance with data protection laws.

5.5 The Data, if required to be shared with 3rd Party shall be done by the DPO under Registrar Office after following due process as per clause 5.4.

5.6 The data of minors will be processed in a way that will not harm their well-being.

5.7 The annual audits will be conducted and access logs will be scrutinized to ensure accountability.

6. DATA ACCESS AND RETENTION

6.1 Only personnel authorized by DPO within the BITS Pilani Mumbai Campus's IT and security departments will have access to personal authentication data and the access logs will be maintained.

6.2 Personal Authentication Data will be retained only for the duration necessary for the stated purpose, after which it will be securely deleted.

6.3 If a student, staff or faculty member permanently exits the BITS Pilani Mumbai Campus due to resignation / termination, convocation / withdrawal, end of the contract or any other condition, their personal authentication data will be permanently deleted within 30 days, unless legal or regulatory obligations require retention.

6.4 The records of student, staff or faculty members will be retained and shall form part of the permanent record as per the retention of the records regulations in place.

7. RIGHTS OF DATA PRINCIPALS

Data Principals have certain rights available to them under the Digital Personal Data Protection Act, 2023. A Data Principal may exercise any of the available rights by submitting an application to the DPO in the prescribed format.

The request will be subject to a thorough review process, ensuring compliance with institutional policies and regulatory requirements. Requests must be formally justifications accompanied by necessary justifications and will undergo verification by the designated authorities before approval.

The Data Principal shall be informed of the consequences of withdrawal of consent, i.e inability to access any part of the campus. Once the Data Principal confirms, the request can be processed further.

8. COMPLIANCE AND ACCOUNTABILITY

8.1 The BITS Pilani Mumbai Campus will appoint / assign the role of a Data Protection Officer (DPO) and he shall be responsible for overseeing compliance of the Personal Authentication Data processing activities set out herein in accordance with the Digital Personal Data Protection Act, 2023.

8.2 A Data Privacy Impact Assessment (DPIA) will be conducted annually to evaluate the risks and effectiveness of data protection measures put in place to protect the Personal Authentication Data.

8.3 Any data breach involving Personal Authentication Data will be reported as per regulatory requirements.

8.4 The BITS Pilani Mumbai Campus reserves the right to amend this policy in compliance with evolving legal and technological requirements and to remain aligned with changes in internal processes and practices.

9. GRIEVANCE REDRESSAL MECHANISM

For any concerns regarding data privacy, individuals may contact:
Data Protection Officer (DPO)
BITS Pilani Mumbai Campus
Email: dpo@bitsom.edu.in
Phone: 0251-2902298

10. FINAL PROVISIONS

10.1 The terms used herein shall have the meanings given to them in this policy. All other terms including "processing", "personal data", "Data Principal", etc. shall have its meaning as defined under the DPDP, Act 2023.

10.2 Violation of this policy by any BITS Pilani Mumbai Campus personnel may result in disciplinary action.

10.3 The BITS Pilani Mumbai Campus will remain compliant with all provisions of the Digital Personal Data Protection Act, 2023 and any amendments thereto.

Annexure I

BITS Pilani
Mumbai Campus

Personal Authentication Data Consent Form for Employees

I, _____ (Full Name), employed as _____ (Designation) at BITS Pilani Mumbai Campus, hereby acknowledge and understand that my personal data including my fingerprint or other biometric information may be collected, used, stored and otherwise processed by BITS Pilani Mumbai Campus, for the following purposes that a deemed to be included in the legitimate uses prescribed under the Digital Personal Data Protection Act, 2023.

1. Campus security & Access Control
2. Identity verification
3. Attendance Record

1.I understand that my personal authentication data will be securely stored and will only be shared with entities authorized by BITS Pilani Mumbai Campus. I am aware of my rights under the Digital Personal Data Protection Act, 2023, including the right to withdraw consent, request access, corrections or erasure of my data, wherever the processing of my personal data is based on my consent.

2.My Personal Authentication Data used for authentication purposes will be deleted within thirty (30) days as per BITS Pilani Mumbai Campus Privacy Policy.

3.By signing this form, I hereby provide my explicit consent to the collection and use of my personal data in accordance with the BITS Mumbai Campus's Data Privacy Policy

Signature: _____

Date: _____

Please contact DPO if you have any questions regarding the BITS Pilani Mumbai Campus Data Privacy Policy or if you wish to exercise any of the rights available to you under the law.

Annexure II

BITS Pilani
Mumbai Campus

PERSONAL AUTHENTICATION DATA CONSENT FORM FOR STUDENTS

I, _____(Full Name), student of _____ in the program _____ with Registration ID _____at BITS Pilani Mumbai Campus, hereby acknowledge and provide my explicit consent for the collection, processing, and storage of Personal Authentication Data including my fingerprints or other biometric information by the BITS Pilani Mumbai Campus for the following purposes:

1. Campus security & access control
2. Attendance & academic records
3. Identity verification

1. I understand that my personal authentication data will be securely stored and will be shared only with entities authorized by BITS Pilani Mumbai Campus. I am aware of my rights under the Digital Personal Data Protection Act, 2023, including the right to withdraw consent, request access, corrections, or erasure of my data.
2. I acknowledge that upon completion of my course or withdrawal from the academic program, by any means, My Personal Authentication Data used for authentication purposes will be deleted within thirty (30) days as per BITS Pilani Mumbai Campus Privacy Policy.
3. By Signing this form or checking in box, I provide my consent to BITS Pilani Mumbai Campus to use my personal authentication data according to BITS Pilani Mumbai Campus's Data Privacy Policy.

Signature: _____
Date: _____

Signature (Parent/Guardian, applicable for individuals below 18 years of age as parents/guardian consent): _____
Date: _____

Please contact DPO if you have any questions regarding the BITS Pilani Mumbai Campus Data Privacy Policy or if you wish to exercise any of the rights available to you under the law.

Annexure III

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PERSONAL AUTHENTICATION DATA CONSENT FORM FOR EMPLOYEES OF CONTRACTORS / VENDORS

I _____ (Full Name), employed as _____ (Designation) with _____ (Contractor / Vendor), hereby acknowledge and understand that my personal data including my fingerprint or other biometric information may be collected, used, stored and otherwise processed by BITS Pilani Mumbai Campus, for the following purposes that a deemed to be included in the legitimate uses prescribed under the Digital Personal Data Protection Act, 2023.

1. Campus security & Access Control
2. Identity verification
3. Attendance Record

1. I understand that my personal authentication data will be securely stored and will only be shared with entities authorized by BITS Pilani Mumbai Campus. I am aware of my rights under the Digital Personal Data Protection Act, 2023, including the right to withdraw consent, request access, corrections or erasure of my data, wherever the processing of my personal data is based on my consent.

2. My Personal Authentication Data used for authentication purposes will be deleted within thirty (30) days upon Resignation/Termination/End of Contract.

3. By signing this form, I hereby provide my explicit consent to the collection and use of my personal data for the purposes mentioned.

Signature: _____

Date: _____