

## Data Privacy Policy

### **Policy brief & purpose**

Our Company Data Protection Policy refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

### **Scope**

This policy refers to all parties (employees, job workers, customers, suppliers etc.) who provide any amount of information to us. Employees of our company must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone with whom we collaborate.

### **Responsibilities**

Respective department head shall be responsible for maintenance and accuracy of this policy. Any queries regarding the implementation of this Policy shall be directed to the respective department head.

### **Policy elements**

As part of our operations, we need to obtain and process information. This information includes any offline or online data, data of customers, suppliers, employees, job workers, product details and design, financial data, etc that makes a person/party identifiable. Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

- Collected and use fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties

Data not to be:

- Communicated informally
- Stored for more than a specified amount of time
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

Further, the Company is also executing Non-Disclosure-Agreement with party/person to the respective transaction.

## **Dispute Resolution and Escalation Process**

Employees with inquiries or complaints about the processing of their personal information shall first discuss the matter with their immediate supervisor. If the employee does not wish to raise an inquiry or complaint with an immediate manager, or if the manager and employee are unable to reach a satisfactory resolution of the issues raised, the employee shall bring the issue to the attention of the Compliance Officer.

Any disputes concerning the processing of the data/ information of non-employees shall be resolved through arbitration.

## **Disciplinary Consequences**

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

## **Monitoring and review**

This policy shall be reviewed for updates by Company Secretary in consultation with IT person and respective department head on every two years. Additionally, the data privacy policy shall be updated in-line with any major changes within the organization's operating environment or on recommendations provided by internal/ external auditors. Any changes made to the policies shall be communicated to all the parties.