


Kewaunee Labway Private Limited
Data Security and Privacy Policy

Policy Owner	Sunil Kumar. D
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Review Frequency	Annual
Version	1.0
Reviewed by (VP- Finance, Treasury and Compliance)	<i>Ravi Tibrewal</i>
Approved by (Managing Director)	

1.0 Introduction

Kewaunee Labway India Pvt Ltd (the Company) is dedicated to guaranteeing the availability, confidentiality, and integrity of all personal and business-critical information entrusted to us by partners, suppliers, customers, workers, and other stakeholders. The Company shall maintain a zero-tolerance approach to unauthorized access, misuse, or mishandling of data. This policy describes how the company shall safeguard data and ensure that it conforms with applicable data protection regulations.

We are therefore committed to ensuring that all such data is collected, processed, stored, shared, and disposed of in a manner that prioritizes privacy, transparency, cybersecurity, and regulatory compliance.

2.0 Scope

This policy is applicable to:

- Every employee of the company, including consultants, contractors, and outside service providers.
- All data types, including cloud-hosted, digital, paper-based, and audio-visual.
- Every platform, device, and information system utilized for data processing, storage, transmission, or disposal.

3.0 Principles

- The company must gather and handle data in a way that is legal, equitable, and open while keeping people informed about the use of their personal data.
- Data shall only be gathered by the company for specific, explicit, and lawful business purposes; it shall not be processed in ways that are inconsistent with those purposes.
- The Company shall demonstrate compliance with this Policy through clear roles, governance measures, training, risk assessments, and documentation.
- To prevent unauthorized access, disclosure, modification, loss, or destruction of data, the company shall take the necessary organizational and technical precautions.
- Through defined roles, governance procedures, training, risk assessments, and documentation, the company shall show that it complies with this policy.
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4.0 Definitions

- **Personal Data** - Any information that identifies or can identify an individual, such as name, contact details, identification numbers, financial details, or employment information.
- **Data Subject** - Any individual whose personal data is collected or processed by the Company including employees, customers, suppliers, and business partners.
- **Processing** - Any activity performed on data including collection, storage, use, sharing, transfer, or deletion whether automated or manual.
- **Data Controller** - The entity responsible for determining the purpose and means of processing personal data. For this Policy, Kewaunee Labway India Pvt Ltd acts as the Data Controller.
- **Data Processor** - Any third party that processes personal data on behalf of the Company under contractual agreement (e.g., software providers, cloud platforms, payroll vendors).

- **Confidential Data** - Non-public information belonging to the Company or its stakeholders, including commercial, financial, project, research, lab design, IP, and contract-related information.
- **Data Breach** - Any unauthorized or accidental access, disclosure, misuse, modification, loss, or destruction of personal or confidential data whether physical or digital.

5.0 Legal Basis for Processing

Kewaunee Labway India Pvt Ltd shall process personal data only where a valid legal basis exists. Personal data shall be processed on one or more of the following grounds:

- a. The data subject has provided clear and informed consent for the processing of their personal data.
- b. Processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering a contract.
- c. Processing is necessary to comply with a legal or regulatory obligation applicable to Kewaunee Labway India Pvt Ltd.
processing is necessary to protect the vital interests of the data subject or another individual.
- d. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority; and
- e. Processing is necessary to support the legitimate interests of Kewaunee Labway India Pvt Ltd or a third party, provided such interests do not override the rights, fundamental freedoms, or privacy of the data subject.

4.0 Rights of Data Subjects

Kewaunee Labway India Pvt Ltd recognizes the following rights of individuals whose personal data is processed:

- Right to be informed about the collection and use of their personal data.
- Right to access their personal data held by the Company.
- Right to rectification of inaccurate or incomplete data.
- Right to request erasure (“right to be forgotten”) where legally permissible.
- Right to restrict the processing of their data.
- Right to data portability.
- Right to object to data processing.
- Rights related to automated decision-making and profiling.

Right to exercise any of the above through a written request to the Data Protection Officer (DPO).

5.0 Policy Commitments

- **Data Security:** Kewaunee Labway India Pvt Ltd is dedicated to protecting personal information by putting in place appropriate organizational and technical measures. The company shall put in place safeguards against unauthorized access, loss, misuse, alteration, or disclosure, such as encryption of sensitive personal data, stringent access controls and user authentication, frequent security audits and risk assessments, employee education and awareness of information security practices, and established protocols for timely reporting and efficient response to data breaches.
- **Data Breach Response:** If a data breach occurs, Kewaunee Labway India Pvt Ltd shall quickly evaluate the situation, determine which data is impacted, and take the necessary steps to limit and lessen the effects. When a breach is likely to put people's rights and freedoms at danger, the company must notify both the affected data subjects and the appropriate supervisory authority within the legally mandated

time frame. Every breach must be recorded, investigated, and used to improve security measures and stop them from happening again.

- **Data Retention and Disposal:** Kewaunee Labway India Pvt Ltd shall retain personal information for as long as required to accomplish the goals for which it was gathered and to satisfy any applicable legal, regulatory, and commercial obligations. When personal information is no longer needed, it must be safely erased, destroyed, or anonymized using approved techniques to avoid abuse, illegal access, or recovery.
- **Third-Party Data Processors:** When Kewaunee Labway India Pvt Ltd hires third-party processors to handle personal data on its behalf, the company must make sure that these parties adhere to all relevant data protection laws and maintain the necessary organizational and technical protections. To guarantee ongoing protection of personal data, data processing agreements must be put into place to specify roles, security requirements, and confidentiality obligations. Third-party compliance must also be routinely assessed.

6.0 Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary action, including termination of employment or contracts, and may also lead to legal action where appropriate.

7.0 Training and Awareness

To prevent information security breaches and foster a culture of security and compliance, Kewaunee Labway India Pvt Ltd shall conduct regular awareness and training programs. All new hires, employees, and relevant stakeholders shall receive mandatory information security and data privacy training, along with periodic refresher courses. Staff in high-risk roles, including finance, HR, and IT, shall receive specialized training tailored to their responsibilities and access to sensitive information.

8.0 Monitoring and Reporting

Kewaunee Labway India Pvt Ltd shall put in place a structured incident response system to guarantee the efficacy of its security procedures and keep a proactive attitude to potential threats. Root cause analysis and thorough documentation are required for the investigation, containment, and remediation of security issues. To foster corporate learning, encourage continuous development, and bolster overall information security resilience, regular reporting on security events, near-misses, and corrective actions must be carried out.

9.0 Continuous Improvement

Kewaunee Labway India Pvt Ltd is dedicated to enhancing its information security procedures on a constant basis. This policy will be reviewed and updated by the company on a regular basis to consider changes in business operations, technology, and the regulatory landscape. Additionally, security improvements and general resilience will be strengthened using the results of audits, risk assessments, and incident investigations.

10.0 Policy Review

Kewaunee Labway India Pvt Ltd shall review and update this policy as necessary to reflect changes in data protection laws and regulations, business operations, or other relevant factors, with the Data Protection Officer (DPO) ensuring that the policy remains current and effective.