



J. KUMAR INFRAPROJECTS LIMITED

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Data Privacy and Cybersecurity Policy

1. Introduction:

J. KUMAR INFRAPROJECTS LTD (“the Company”) is committed to protecting the privacy and security of all data and information collected, processed, and stored as part of its operations. This Data Privacy and Cybersecurity Policy (“this policy”) outlines the measures and practices we adopt to ensure the confidentiality, integrity, and availability of data, as well as compliance with applicable data protection and cybersecurity laws, regulations and ensures robust cybersecurity practices in today's digital landscape.

2. Scope:

This policy applies to all employees, contractors, partners, vendors, and third parties who access or handle J. Kumar Infraprojects Limited data and information systems.

3. Data Privacy:

3.1. Data Collection and Use:

- We collect and process data only for legitimate business purposes, and data collection is transparent.
- Personal data is used only for the purposes specified during collection or with the individual's explicit consent.

3.2. Consent and Permissions:

- Whenever required, we obtain informed consent from individuals before collecting, processing, or sharing their personal data.

3.3. Data Access and Sharing:

- Access to personal and sensitive data is restricted to authorized personnel on a need-to-know basis.
- Data is shared with external parties only after thorough due diligence and the implementation of data protection agreements.

3.4. Data Retention:

- Personal data is retained only for the period necessary to fulfill its intended purpose, as per applicable laws and regulations.
- We follow data retention schedules to ensure compliance with legal requirements.

3.5. Data Subject Rights:

- Individuals have the right to access their personal data, rectify inaccuracies, and request deletion, in accordance with relevant laws.
- Requests related to data subject rights are handled promptly and in accordance with the law.

4. Cybersecurity:

4.1. Information Security:

- We implement a range of technical and organizational measures to protect data from unauthorized access, disclosure, alteration, and destruction.
- Security measures are regularly reviewed and updated to align with emerging threats.

4.2. Access Controls:

- Access to systems and data is granted based on roles and responsibilities, and strong authentication mechanisms are enforced.
- Privileged access is closely monitored and restricted.
- Multi-factor authentication is enforced for accessing sensitive systems.

4.3. Network Security:

- Data in transit is encrypted using robust encryption protocols used to safeguard data during transmission and storage.
- Firewalls, intrusion detection systems, and other security measures are employed to secure our network infrastructure.

4.4. Incident Response:

- We maintain an incident response plan to effectively handle and mitigate cybersecurity incidents.
- Any security incidents are documented, reported, and analyzed for continuous improvement.

4.5. Employee Training:

- Regular training sessions are conducted to educate employees about cybersecurity best practices and their role in maintaining data privacy.

5. Compliance:

- We adhere to all applicable data protection laws, regulations, and industry standards.
- Data protection impact assessments (DPIAs) are conducted for high-risk data processing activities.

6. Review and Revision:

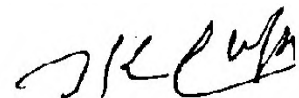
- This policy is subject to periodic review to ensure its effectiveness and relevance.
- Updates are communicated to all stakeholders and made available in our policy repository.

7. Reporting and Contact:

- Any concerns or incidents related to data privacy or cybersecurity should be reported to the General Manager of Information Systems.

By following the principles outlined in this Data Privacy and Cybersecurity Policy, J. Kumar Infraprojects is committed to maintaining the trust of its clients, employees, partners, and stakeholders, and to upholding the highest standards of data privacy and cybersecurity.

For J. Kumar Infraprojects Limited



**Jagdishkumar M. Gupta
Executive Chairman**