


DOCUMENT STATUS	<b>INFORMATION SECURITY MANAGEMENT SYSTEM POLICY</b> <b>Privacy Policy</b>			
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**(I) TERMS USED IN THIS POLICY**


*In this Data Privacy and Protection Policy:*

- **“GDPR”** means the EU General Data Protection Regulation.
- **“DPDPA”** means the Digital Personal Data Protection Act, 2023 of India.
- **“ITAA”** means the Information Technology Amendment Act, 2008 of India.
- **“SEBI”** means the Securities and Exchange Board of India.
- **“Companies Act”** means the Companies Act, 2013 of India.
- **“CCPA”** means the California Consumer Privacy Act of the United States. •
- **“Personal Data”** means any information relating to an identified or identifiable natural person.
- **“Sensitive Personal Data”** means personal data as defined under Rule 3 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.
- **“Policy”** means this Data Privacy and Protection Policy.
- **“Service”** refers to a service that Sansera’ provides, for a fee or gratis. You are using our Service when you actively sign up or sign in to get access to any Service provided by us.
- **“we”, “us”, “our”, and “Sansera”** refer to Sansera Engineering Limited
- **“Website”** refers to websites of Sansera Limited and its group companies.
- **“you”** refers to you, as a user or subscriber of the services provided by us.

**(II) OUR COMMITMENT TOWARDS PROTECTING PERSONAL INFORMATION**

Sansera Engineering Limited, hereinafter referred to as the “Company” or “Sansera”, is committed to keeping your personal data private. We are committed to safeguarding the privacy of our website visitors and service users. The Privacy Statement (“Statement”) enumerated below, provides information that we gather through the Service, how we use such information, and the steps we take to protect such information. By visiting the Site, or by purchasing or using the Service, you accept the privacy practices described in this Policy.

Our commitment to protecting privacy goes beyond the minimum legal and regulatory requirements. We strive for best-in-class data protection and privacy management, which requires a sound data privacy governance structure and effective data privacy compliance

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*and best practices program to ensure that we meet ever-changing and increasingly complex regulatory standards and all contractually agreed privacy obligations.*

*We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website. Please refer the Cookies Policy in section 9.*

## **1. SCOPE**


*This Policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.*

*This Policy applies to all the Company-owned websites, domains, and services and those of our wholly owned subsidiaries ("the Company sites or services"), except that a privacy policy or statement specific to a particular the Company service or program may supersede or supplement this Privacy Policy Statement.*

*Personal information concerning the Company and its customers, including outsourcing and other services clients, business partners, employees, former employees, and applicants for employment ("covered individuals") collected and processed offline is also governed by this Privacy Policy Statement except where the contract with a covered individual defines different requirements which will take precedence over this Privacy Policy Statement.*

## **2. PRIVACY POLICY STATEMENT.**

*Your privacy is important to us. We will use your personal information only in the manner set out in this Policy. We act in accordance with the applicable data protection laws, including GDPR, DPDPA and CCPA. We are committed to safeguarding the privacy of our website visitors, clients, prospects, shareholders and research participants.*

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*This Policy sets out how we deal with your personal information.*

*Our commitment towards protecting your personal information includes the following obligations:*

- *We promise to protect your privacy and treat the information you give us as confidential.*
- *The information you provide to us will be used by us only for the purpose for which it was sought.*
- *We will not release your personal information to any third party without your consent unless such disclosure is required by any law, rule or regulation or was in response to a valid order of a court or authorized agency of government or other legal process.*
- *We will never try to sell you anything and we will never sell your personal data to anyone.*
- *Your decision to provide or not to provide any information will be respected without question.*

### **3. WHAT DATA DO WE COLLECT OR PROCESS ABOUT YOU, AND FOR WHAT PURPOSE?**


- *We may process information contained in any enquiry you submit to us regarding goods and/or services (“enquiry data”). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you and for communicating with you. The legal basis for this process is your consent.*
- *We may process information relating to our customer relationships, including customer contact information (“customer relationship data”). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications, promoting our products and services to customers, and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our website and business. In some cases, the legal*

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basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- We may process information relating to transactions, including purchases of goods and services, that you enter with us and/or through our website (“transaction data”). The transaction data may include your contact details, your banking details, your credit card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services, keeping proper records of those transactions, and for communicating with you. The legal basis for this process is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our business. In some cases, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (“notification data”). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters, and for communicating with you. The legal basis for this processing is your consent.
  - We may process information relating to our shareholders, including shareholder contact information (“shareholder data”). The shareholder data may include your name, address, contact details, shareholding information, and information contained in communications between us and you. The source of the shareholder data is you, your authorized representatives, or our registrar and transfer agents. The shareholder data may be processed for the purposes of managing our shareholder relationships, communicating with shareholders, keeping records of those communications, and for regulatory compliance. The legal basis for this processing is compliance with legal obligations under the Companies Act, 2013 and SEBI regulations, as well as our legitimate interests in maintaining proper shareholder records.

#### **4. WHOM DO WE SHARE YOUR DATA WITH?**

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- *We may disclose your personal data to any of our employees, officers, and agents as long as such disclosure is reasonably necessary for the purposes, and on the legal basis, as mentioned in this Policy.*

- *We may disclose your personal data to any member of our group of companies (this means our ultimate holding company and all its subsidiaries and joint venture partners) with appropriate security as long as such disclosure is reasonably necessary for the purposes, and on the legal bases, set out in this Policy.*

- *We may disclose your personal data to our insurers and professional advisers with appropriate safeguards as long as such disclosure is reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure and for protecting other legitimate interest of the Company.*

- *We may disclose your personal data to our suppliers or subcontractors as long as such disclosure is reasonably necessary for providing Services to you.*


- *As a listed company, we may disclose shareholder data to regulatory authorities including SEBI, stock exchanges, the Registrar of Companies, our registrar and transfer agents, and other regulatory bodies as required by applicable laws.*

- *In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.*

*We will not sell, share, rent or otherwise intentionally transfer your name, address, telephone number or e-mail address to market research companies, direct marketing companies or anyone else. The only exceptions when we may disclose your personal information to third parties are as follows:*

- *You request us to share, or consent to us sharing, your data with the third parties for a specified purpose*

- *We provide your responses to a third party who is contractually bound to keep the information confidential and use it only for research or statistical purposes*

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- *In the rare but possible circumstance that the information is subject to disclosure pursuant to judicial or other government subpoenas, warrants, orders or for similar legal or regulatory requirements.*


## **5. HOW LONG DO WE RETAIN YOUR DATA?**

*Your Personal Data processed by Sansera is kept for no longer than is necessary for the purposes for which the Personal Data is processed in line with legal, regulatory or statutory obligations. At the expiry of such periods, your Personal Data will be deleted or archived to comply with legal retention obligations. For shareholder data, we retain records as required by the Companies Act, 2013, SEBI regulations, and other applicable laws. This typically includes maintaining shareholder records for a minimum of eight years.*

## **6. WHAT ARE YOUR RIGHTS REGARDING YOUR DATA WITH US?**


*This Section summarizes the rights that you have under data protection law. Please note that some of the rights available to you are convoluted and may not be represented in detail in this Policy. We advise you to pursue the relevant laws for a complete understanding of your rights. Your principal rights concerning your Personal Data under GDPR, DPDPA and CCPA are as below:*

- *Right to access: You have the right to confirm as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data.*
- *Right to rectification: You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.*

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- Right to erasure: In certain circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data provided to us is no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw consent to consent-based processing; your object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed.*
- Right to withdraw consent: To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal. You may exercise any of your rights in relation to your personal data by a written notice to us on (Privacy Email ID of Sansera). In order for us to comply with your request, your notice must clearly state the right that you wish to exercise and identify your information in respect of which you wish to exercise such right. Please note that as a security measure, we may require you to verify your identity before accepting any request concerning your Personal Data.*
- Right to data portability: You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller without hindrance from us.***
- Right to object to processing: You have the right to object to our processing of your personal data on grounds relating to your particular situation, where the processing is based on our legitimate interests.***
- Right to restriction of processing: You have the right to request the restriction of processing of your personal data in certain circumstances, such as when the accuracy of the data is contested.***

*You may exercise any of your rights in relation to your personal data by a written notice to us on **madhukar\_bhat@sansera.in**. In order for us to comply with your request, your notice must clearly state the right that you wish to exercise and identify your information in respect of which you wish to exercise such right. Please note that as a security measure, we may require you to verify your identity before accepting any request concerning your Personal Data.*

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## 7. COOKIES POLICY

We use cookies and similar tracking technologies to track activity on our website and hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier.

## 8. DATA LOCALIZATION AND CROSS-BORDER TRANSFERS

- In accordance with the DPDPA 2023, we maintain primary copies of sensitive personal data of Indian citizens on servers located in India.
- Any cross-border transfer of personal data is done in compliance with the requirements of the DPDPA 2023, ensuring adequate protection through appropriate safeguards.
- We maintain a comprehensive record of all cross-border transfers of personal data as required by applicable Indian laws.
- For international transfers, we implement appropriate safeguards such as Standard Contractual Clauses, Binding Corporate Rules, or other mechanisms recognized under Indian law.


## 9. DATA BREACH NOTIFICATION

In the event of a data breach involving personal data:

- We will notify the Data Protection Board of India within 72 hours of becoming aware of the breach, as required by the DPDPA 2023.
- We will notify affected data subjects without undue delay, providing clear information about the nature of the breach and steps being taken to mitigate potential harm.
- As a listed company, we will make appropriate disclosures to stock exchanges if the breach constitutes a material event under SEBI (LODR) Regulations, 2015.
- We maintain a data breach response plan that is regularly reviewed and updated to ensure compliance with evolving regulatory requirements.

## 10. CONSENT MANAGEMENT

- We obtain explicit, informed consent before collecting or processing personal data, as required by the DPDPA 2023.
- Our consent mechanisms are designed to be clear, specific, and easily understandable.

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- *You have the right to withdraw consent at any time through easily accessible mechanisms.*
- *We maintain comprehensive records of all consents obtained, including the date, method, and specific purposes for which consent was given.*
- *For children's data, we obtain verifiable parental consent in accordance with the DPDPA 2023.*

## **11. DATA PROTECTION OFFICER**


*Sansera has appointed a Data Protection Officer (DPO) responsible for overseeing our data protection strategy and implementation. Our DPO serves as the point of contact for data subjects and regulatory authorities on matters relating to the processing of personal data.*

## **12. LISTED COMPANY SPECIFIC DISCLOSURES**

*As a listed company in India, Sansera Engineering Limited is subject to additional regulatory requirements regarding data disclosure and protection:*

- *We comply with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.*
- *We maintain an Information Security Policy in accordance with SEBI Circular SEBI/HO/MIRSD/CIR/P/2023/48 dated March 30, 2023, on "Cyber Security and Cyber Resilience".*
- *We comply with regulatory requirements regarding Unpublished Price Sensitive Information (UPSIs) as per SEBI (Prohibition of Insider Trading) Regulations, 2015.*
- *We have implemented data classification systems to identify and properly protect material non-public information.*
- *We maintain data security standards that align with the standards prescribed by the National Critical Information Infrastructure Protection Centre (NCIIPC) and the Indian Computer Emergency Response Team (CERT-In).*

## **13. CORPORATE GOVERNANCE AND PRIVACY**

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- Our Board of Directors provides oversight of our privacy program through the Risk Management Committee.
- We conduct periodic privacy impact assessments and data protection audits.
- We integrate privacy by design principles into our business operations and product development.
- We provide regular training to our employees on data protection and privacy requirements.
- We require our vendors and service providers to adhere to appropriate data protection standards through contractual safeguards.

#### **14. CONTACT INFORMATION**

For any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact:

**Data Protection Officer Name: Mr. Madhukar Bhat**

**Sansera Engineering Limited**

**Plant 7, No. 143/A, Jigani Link Road Bangalore - 560105, Karnataka, India**

**Email: [madhukar\\_bhat@sansera.in](mailto:madhukar_bhat@sansera.in)**

**Phone: +91-9901999634**

#### **15. Approval Details:**

<b>Authorization Level</b>	<b>Name</b>	<b>Designation</b>
<i>Prepared By</i>	<i>Vigneshkhanna Alagesan</i>	<i>Manager of IT Security and Compliance</i>
<i>Reviewed By</i>	<i>Samir Mehta</i>	<i>General Manager - Information Technology</i>
<i>Approved By</i>	<i>Rajesh Kumar Modi</i>	<i>AVP – Chief Legal Officer</i>
<i>Date of Approval</i>	<i>17<sup>th</sup> April 2025</i>	