# DATA PRIVACY POLICY OF IRCON INTERNATIONAL LIMITED

## 1.0 PREAMBLE

IRCON is highly sensitive to data privacy and hence is dedicated to safeguarding personal information in compliance with applicable data protection laws and regulations. Our organization has established strict guidelines and protocols outlined in this policy to guarantee the privacy and security of personal data and to ensure the confidentiality of the strategic corporate information.

## 2.0 POLICY OBJECTIVE

IRCON International Limited (hereinafter referred to as "the Company" or "IRCON") deals with respecting the privacy of its customers, employees, partners, and stakeholders and is committed to protecting their personal information. This policy outlines how we collect, use, disclose, and protect personal information and strategic corporate information in accordance with applicable data privacy laws and regulations.

#### 3.0 PURPOSE & SCOPE OF THE POLICY

This policy applies to all personal information collected, processed, stored, or used by IRCON, whether through our websites, applications, products, services, or other means.

# 4.0 POLICY STATEMENTS

- IRCON shall collect personal information only for specified, explicit, and legitimate purposes, and we only process that information in a manner that is compatible with those purposes. We collect personal information directly from individuals whenever possible, and we obtain consent for the collection, use, and disclosure of personal information as required by law.
- IRCON shall use personal information only for the purposes for which it was collected, unless we obtain the individual's consent for additional use or disclosure, or unless otherwise required or permitted by law. We take reasonable steps to ensure the accuracy, completeness, and currency of personal information and we keep personal information only for as long as necessary to fulfill the purposes for which it was collected.
- IRCON shall not disclose personal information to third parties except as required or permitted by law or as authorized by the individual. We use contractual and other means to ensure that third parties who process personal information on our behalf provide an appropriate level of protection for that information.

- IRCON may disclose personal information in connection with a merger, acquisition, or sale of all or a portion of our business, or as part of a corporate reorganization or other change in corporate control.
- IRCON shall take appropriate technical, physical, and organizational measures to protect personal information against loss, theft, unauthorized access, disclosure, copying, use, or modification. We conduct regular risk assessments and audits of our data processing activities to identify and mitigate potential data privacy risks.

# 5.0 AMENDMENT AND INTERPRETATION

The power to modify this policy may be entrusted to the CMD, in consultation with the Director (Finance) or any other functional director. They may review or amend this policy, in whole or in part, from time to time, as required by the Act or any other statute.

#### 6.0 COMMUNICATION

The Policy and any amendment thereto shall be posted on the website of the Company and communicated to all employees in an appropriate and meaningful manner.

### 7.0 GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Agreement or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment/ modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.