

DATA PRIVACY AND DIGITAL PERSONAL DATA PROTECTION POLICY

Formulated pursuant to the Digital Personal Data Protection Act, 2023 (India) and applicable data protection regulations

1. Introduction and Commitment

ShinzoX Group Limited processes personal data of employees, customers, vendors, shareholders, patients (healthcare vertical), and other individuals ("Data Principals") across its diverse business operations in healthcare, banking and financial services, information technology and digital services, global trade, spirits, logistics, and industrial equipment. The Company is committed to collecting, using, and protecting personal data responsibly, transparently, and in full compliance with the Digital Personal Data Protection Act, 2023 ("DPDP Act") and all other applicable data protection laws.

The Company acts as a Data Fiduciary — determining the purpose and means of processing personal data — and accepts the obligations that come with that role.

2. Scope

This Policy applies to:

- All personal data processed by ShinzoX Group Limited and its subsidiaries in digital form
- All employees, contractors, and third parties who process personal data on behalf of the Company
- Personal data of individuals located in India, as well as Indian citizens whose data may be processed internationally

3. Categories of Personal Data Processed

The Company may process the following categories of personal data depending on the business context:

- Identity data: Name, date of birth, gender, PAN, Aadhaar (with applicable safeguards), passport
- Contact data: Address, email, phone number
- Financial data: Bank account details, salary, tax information, transaction records
- Employment data: Job title, performance records, leave records, attendance
- Health data: Medical records, health assessments (healthcare vertical only, with enhanced safeguards)
- Digital data: IP addresses, cookies, usage logs, device identifiers (IT/digital services vertical)
- Shareholder data: Folio numbers, demat accounts, dividend payment details

4. Principles of Data Processing

The Company shall process personal data in accordance with the following principles:

- Lawfulness:** Personal data shall be processed only with valid consent or on other lawful grounds as prescribed under the DPDP Act
- Purpose Limitation:** Data shall be collected only for a specified, lawful purpose and not used for incompatible purposes
- Data Minimisation:** Only data that is adequate, relevant, and limited to what is necessary shall be collected
- Accuracy:** Reasonable steps shall be taken to ensure that personal data is accurate and up to date
- Storage Limitation:** Personal data shall be retained only for as long as necessary for the specified purpose
- Security:** Appropriate technical and organisational measures shall be implemented to protect personal data

5. Consent and Notice

Where consent is the lawful basis for processing, the Company shall provide a clear, plain-language privacy notice to the Data Principal in English or an applicable Eighth Schedule language, explaining:

- What personal data is being collected
- The purpose(s) for which it will be processed
- How to exercise Data Principal rights
- How to lodge a complaint with the Data Protection Board of India

Consent shall be free, specific, informed, unambiguous, and revocable at any time. The Company shall not use consent obtained as a condition of service where consent is not required for that service.

6. Rights of Data Principals

Data Principals have the following rights under the DPDP Act, which the Company shall honour:

- Right to access: Obtain information about the personal data processed and processing activities
- Right to correction and erasure: Correct inaccurate or outdated data and, in certain circumstances, request erasure
- Right to grievance redressal: File a complaint with the Company's Data Protection Officer
- Right to nominate: Nominate another individual to exercise rights in case of death or incapacity

Requests to exercise these rights may be submitted to: privacy@shinox.com. The Company shall respond within the timelines prescribed under applicable law.

7. Children's Data

The Company shall not knowingly process the personal data of a child (individual under 18 years of age) without obtaining verifiable consent of a parent or guardian. The Company shall not undertake tracking or behavioural monitoring of children or target advertising directed at children.

8. Data Security

The Company shall implement reasonable technical and organisational security measures proportionate to the nature and volume of personal data processed, including:

- Encryption of personal data in transit and at rest
- Access controls based on the principle of least privilege
- Regular security assessments and penetration testing
- Employee training on data protection and information security
- Vendor and processor due diligence and contractual safeguards

9. Data Breach Response

In the event of a personal data breach, the Company shall:

- Notify the Data Protection Board of India within 72 hours of becoming aware of the breach, or as prescribed under applicable rules
- Notify affected Data Principals of breaches likely to result in high risk to their rights, in clear and plain language
- Document all data breaches in the Company's Breach Register
- Conduct a root cause analysis and implement remediation measures

10. Data Protection Officer

The Company has designated Vaibhav Pratap as the Data Protection Officer ("DPO"). The DPO is responsible for overseeing data protection compliance, advising on data protection obligations, and serving as the point of contact for Data Principals and regulatory authorities. The DPO may be contacted at: privacy@shinox.com.

11. Third-Party Data Processors

Where the Company engages third parties to process personal data on its behalf ("Data Processors"), it shall enter into data processing agreements that require the processor to: process data only on the Company's documented instructions; implement appropriate security measures; assist the Company in meeting its obligations; and delete or return data upon termination of the engagement.

12. Cross-Border Data Transfers

Transfers of personal data outside India shall comply with applicable provisions of the DPDP Act and rules, including any restrictions on transfer to notified countries or requirements for approved transfer mechanisms.

13. Review

This Policy shall be reviewed at least annually and updated to reflect changes in applicable law, business operations, or technology. The current version shall be published on the Company's website at www.shinox.com/privacy.