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Jakson Group includes Jakson Limited, Jakson Engineers Limited and their respective subsidiaries, branches, Joint ventures and other entities under the same Management / control (collectively referred to as the "Company" or "Jakson" or "Us" and also indicated by "us", "we" or "our") is committed to protecting your privacy and personal information. We encourage you to read the Privacy Policy.

This Privacy Policy is intended to let you know what personal information we collect, why we collect (purpose) and what we do with it (use), processing/sharing and transfer of personal information and your rights relating to such personal information shared with us. By using the Sites/Apps, you agree, understand and consent to this Privacy Policy and any future amendments and additions. This Privacy Policy also describes your personal data protection rights, including a right to object to some of the processing of personal data that the Company carries out.

Who all are covered

All persons ("Covered Persons"), whose personal information is either collected/ received/ possessed/ stored/ dealt in/ handled by Jakson / who (i) visit the site http://www.jakson.com (ii) any other websites (iii) mobile applications (Apps) owned and / or operated by Jakson on which this privacy policy is linked and (iii) the social media accounts and/or pages that Jakson control (Sites/Apps), and provide information to Jakson online, are covered under this Policy.

Definition:

"Personal information (PI)" means any information that relates to a person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate / person, and is capable of identifying such person.

"Sensitive personal data or information (SPI) " of a person means such personal information which consists of information relating to:

- Password
- Financial information such as Bank account or credit card or debit card or other payment instrument details;
- Physical, physiological and mental health condition;
- Sexual orientation;
- Medical records and history;
- Biometric information;
- Any detail relating to the above category as provided to us for provisioning services / supplying product ; and
- Any of the information received under above clauses by us for processing, stored or processed under lawful contract or otherwise

Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for these purposes.

Personal Information we collect

We may collect and process different types of personal data while operating our business, engaging personnel and providing our services or selling our products. Such personal data may include, without limitation:

- Personal identifiers such as your first and last name, usernames, age, marital status, gender, job title, etc.
- Contact details including email address, telephone number(s), and postal address.
- Recruitment-related data such as your curriculum vitae, education and employment history, details of professional memberships and other personal data relevant to the purpose.
- Technical data such as your IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website
- Identification and other background verification data such as your passport or other government-issued identity documents, utility bills, social security / Aadhaar or any other national Identification number, back account details, etc.
- Data you may provide to attend meetings, register for events, sign up for notifications, etc. including data pertaining to special access needs and dietary requirements.

How we collect Information?

We generally collect your personal information directly from you. This may be achieved through your interactions with us including interactions via our Sites/Apps, other social media applications or internet sites, telephone, social / corporate / business sponsored events, email or writing to us. We may also collect your personal information from a third-party source, such as our vendors, business partners, government authorities and judicial authorities.

Why we collect Information?

Unless otherwise provided in the Policy, we may use personal information collected from the various ways/sources including:

- to verify your identity to register you, and create and operate your account(s) with us;
- to provide the Services or supply the products to you;
- to process payments made for our Services or products;
- to comply with legal / contractual obligations;
- to administer and protect our business and the Services or products, including for troubleshooting, data analysis, system testing, and performing internal operations;
- for risk control, fraud detection, and prevention;
- to perform our obligations that arise out of the arrangement we are about to enter or have entered with you;
- to respond to court orders, establish or exercise our legal rights, or defend ourselves against legal claims;
- to improve customer service or products to effectively respond to your service requests and support needs;
- to improve the functionality of our Services or products based on the information and feedback we receive from you;
- to send notifications to manage our relationship with you including to notify you of changes to our Services, send you information and updates pertaining to the Services you have availed, and to receive occasional company news and updates related to us or the Services;
- to monitor trends and personalise your experience;
- to market and advertise the Services or products to you;
- to improve our business; and

- to conduct training and AI-based skill training.
- For internal business operations including:
 - i. Reviews and data analysis for the website (e.g., to determine the number, category of visitors to specific pages within the website).
 - ii. To manage, operate, maintain and secure our Sites/Apps, network system, and other assets and to customize/personalise your experience with us, which may include displaying content based upon your preferences.
 - iii. For the purposes of analysing the use of the Sites/Apps, enabling and monitoring your use of our Sites, /Apps operating our Sites/Apps, ensuring the security of our Sites/Apps, for maintaining back-ups of our databases.
 - iv. To help diagnose problems with our server, and to administer our Sites/Apps.
- to comply with our legal obligations or as otherwise permitted by law.
- to investigate potential breaches, or to protect the rights, property or safety of Jakson, the Users of our Sites/Apps or others.
- For any other purpose necessary or incidental to our business.
- For any other purpose for which you give your consent.

In the event we use your Personal Information for other purposes, not specified above, we will inform you about the specific purposes for processing of your personal information and, when required, our basis for doing so at the time we collect the Personal Information from you to the extent required by law.

For the purposes of clarity, we may also use your personal information in combination with information we obtain from third parties about you for the same purposes described above.

Information Retention, Information Processing and Information Storage:

We retain personal data for as long as is reasonably required to fulfil the purpose for which such data was collected, and any linked purposes such as satisfying any legal, contractual, accounting, or reporting requirements. In determining data retention periods, Jakson takes into consideration local laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need personal information, we may securely delete or destroy it.

Information Sharing:

We may share the Personal Information collected from the Sites/Apps with third parties as outlined in this section to

1. Affiliates

Our parent company, subsidiaries, joint ventures, group and associate companies under the same Management / control.

- 2. Business Partners
- (i) Service Providers who perform services on behalf of us and which may need information about you to perform their functions including but not limited to authorised service partners, call centre operators, marketing contractors, social media website providers, data entry service providers, IT agencies operating handling or maintaining Sites/Apps, storing/processing information, overseas service providers who work for us etc.

- (ii) Vendors who are business associates like suppliers, research and development vendors, professional advisors, agents, representatives etc.
- 3. Other Partners / Customers

Any third party with whom Jakson co-brand or partner with or collaborate with or with any other third parties as may be necessary for business purposes or to investigate potential data incidents or to protect the rights, property and safety of Jakson and the Users of our Sites/Apps or others.

4. Legal Authorities

We may share your Personal Information in response to any notice, order, investigation or demand or request or any other communication from a law enforcement agency, autonomous body, judicial or quasi-judicial body which necessitate or mandate the sharing of such personal information, or to otherwise comply with applicable laws.

5. International Sharing AND / OR International Transfers

We are a global company and therefore will use global dealers, distributors, vendors, subcontractors and other business partners, as well as global IT systems and applications. We may require the transfer of PI/SPI to other third parties that are located outside of the Jakson country of business, India. We shall develop a standardized approach for protection of data moving across borders. We will adopt appropriate technical and administrative controls that apply well to cross border data flows to act as an accountability framework for information management as a whole and including natural checkpoints for each step of international transfer.

These entities may use this information for the purposes outlined above.

Access and Accuracy

Jakson wants to maintain only accurate information about the users.

You can request access to your personal information by contacting us at <u>DPO@jakson.com</u>. Upon receipt of appropriate identification information, and where required by applicable Data Protection Laws, Jakson will provide you with access to the information that it maintains about you.

Your Rights

At Jakson, we take your privacy very seriously, we use your information to enhance your experience. When it comes to your privacy rights, we want to make sure you have everything you need to make informed decisions. You have the right to:

- Right of Access You have the right to access your information We shall provide a copy of the personal information undergoing processing.
- Right to Rectification You have the right to update any inaccurate or incomplete data, if any, through written request.

- Right to Erasure Except in specific cases where provided by law, you have the right to request that we delete any Personal Information which we are holding about you.
- Right to Restriction of Processing Except in specific cases where provided by law, you have the right to restrict processing of all or some of your personal information (e.g., if we have no legal right to process it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- Right to Data Portability You have the right to receive back your personal information However we shall not be obligated to protect the data once such portability takes place.
- Right to Object to the Processing You have the right to object, on grounds relating to your situation, at any time to processing of personal data concerning you. Such right can be exercised at any time where your personal data is processed for direct marketing purposes in writing
- Right to object being subjected to a decision based solely on automated processing, including profiling.
- You may opt-out of receiving non-essential (promotional, marketing-related) communications from us & or our Affiliates / Business Partner / Other Partners/ Third Parties. If you want to opt-out from any such communication as mentioned above then you may send an email to DPO email ID (DPO@jakson.com).

At any stage, you can withdraw your consent to the retention/storage/processing of your Personal Information and Jaskon shall erase the Personal Information withdrawn by you unless there is a contractual obligation or legal requirement/obligation to retain/hold it or otherwise permitted by law to retain it. However, upon such withdrawal, the Company will not able to communicate with you and provide you with certain information on product and/or services which are required for fulfilment of any obligation.

Jakson may be allowed by law, in particular in case of excessive or manifestly unfounded request, to charge a fee for fulfilling your request, subject to applicable conditions. The relevant contact details of Data Protection Officer are provided in this Policy.

Data Security

Jakson takes data security seriously, and we use appropriate technologies and procedures to protect personal data. Our information security policies and procedures are aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements. For example:

- Policies and procedures: We have reasonable technical, physical and operational security measures intended to protect your personal data from loss, misuse, alteration, or unintentional destruction. Our security measures are periodically reviewed and updated to provide appropriate security for all personal data held by us.
- We place appropriate restrictions on access to personal data.
- We implement appropriate measures and controls, including monitoring and physical measures, to store and transfer data securely.

- We conduct privacy, information security, and other applicable training on a regular basis for our employees and contractors who have access to personal data and other sensitive data.
- We require our third-party vendors and providers to protect any personal data with which they are entrusted in accordance with applicable law and our security policies and procedures.

We shall expeditiously redress the grievances, but within reasonable time as may be provided in applicable laws.

Please note that email communications are not always secure, so please do not include credit card information or other sensitive information in any email to us.

Update to this Privacy Policy

We may occasionally update this Privacy Commitment. By using our Services after such update, your consent to updates made to this Privacy Commitment.

We encourage you to periodically review this Privacy Commitment for the latest information on our privacy practices.

Contact us: Jakson Group A-43, Phase II Extension, Hosiery Complex, Noida - 201305, Uttar Pradesh, India Email Id: dpo@jakson.com