

PRIVACY POLICY

MS Certification Services Private Limited and its direct and indirect subsidiaries as well as foreign associate offices (which together comprise “MSCERT”), are committed to meeting legal and regulatory requirements regarding data protection and privacy where it conducts its business activities. This Privacy Policy (“Policy”) defines the minimum standards with respect to MSCERT collecting, processing, or otherwise using personal data, including information that may be considered as sensitive Personal Data (“Personal Data”) about individuals including MSCERT associates, business contacts, customers or vendors (“Individuals”).

Where MS Certification Services Private Limited controls other company entities, such other companies will be required to abide by the principles set in this Policy.

PRIVACY PRINCIPLES

MSCERT will handle Personal Data in accordance with the following principles. MSCERT will ensure that its business partners and vendors comply with the principles of this Policy and applicable legal and regulatory compliance standards through appropriate contractual agreements.

· Lawfulness of Processing

MSCERT will collect, store, process, use, transfer, analyze, or otherwise handle (“Process” or “Processing”) Personal Data in accordance with applicable legal requirements for legitimate business or compliance purpose or if individuals have provided consent to the Processing. MSCERT will limit the Processing of

Personal Data in terms of scope and duration, as is necessary for the intended purpose.

- Transparency

In accordance with applicable legal requirements, MSCERT will provide information to individuals that explains the scope and purpose of Processing, and whom to contact to seek clarifications about privacy or data protection.

- Security and Confidentiality

MSCERT aims to protect the security and confidentiality of individuals' Personal Data and implement physical, technical and organizational measures against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure or access. MSCERT will ensure measures are appropriate to the risks represented by the Processing it carries out and the nature of those Personal Data.

- Privacy by Design

MSCERT incorporates the principles of Privacy by Design into all of its personal data processes executed using digital systems, technologies or manually. By default, privacy requirements are embedded into every standard, protocol and process followed by MSCERT.

- Disclosure

MSCERT discloses, when required/asked, personal data to third parties only for the purposes identified in the privacy notice, with the consent of the individual, or as required for lawful purposes. Third parties refer to public authorities, Law Enforcement Agencies and similar authorities.

DATA SUBJECT RIGHTS

In accordance with applicable legal requirements, MSCERT will provide opportunity to exercise data subject rights, which are available to the individuals in the context of their engagement with MSCERT. Such rights may include the right to request access to their Personal Data, to correct inaccurate or incomplete Personal Data or to object to the Processing of their Personal Data. Each Data Subject Request is validated and tracked to closure. As per the applicable law, and the engagement of data subject with MSCERT, there might be other rights available such as right to be forgotten, right to withdraw consent, right to data portability, etc. MSCERT will ensure its compliance and deploy all required measures to help data subjects exercise their rights granted.

INTERNATIONAL DATA TRANSFERS

MSCERT operates on a global level and from time to time it may be required to transfer Personal Data across countries. MSCERT recognizes that Personal Data needs to be treated with care, including data transfer to countries, which may not have adequate data protection laws. If MSCERT transfers Personal Data to such countries, it will protect these Personal Data as set out in this Policy and in accordance with the requirements of applicable law.

DATA RETENTION

MSCERT will observe retention policies and procedures so that it deletes Personal Data after a reasonable time and the purposes are met. Exception applies if in the context of those purposes, it is necessary to keep the Personal

Data indefinitely, or a law requires the Personal Data to be kept for a certain time. When MSCERT no longer needs to keep Personal Data for the purposes, for which they are held, it will delete them as soon as practicable.

JURISDICTION-SPECIFIC REQUIREMENTS AND IMPLEMENTATION

National data protection and privacy laws may impose additional requirements on MSCERT for the Processing of Personal Data. Where required, MSCERT will establish procedures and guidelines in order to supplement the principles of this Policy and engage with relevant regulatory/ supervisory authority, as required.

PRIVACY ORGANIZATION AND CONTACT

MSCERT has set up a global Privacy Function, which is headed by the Head - Global Privacy Office of MSCERT, and which is tasked with overseeing and implementing privacy and applicable data protection requirements. Specific data protection or privacy functions and roles may be added for individual countries or geographies. MSCERT also appoints Data Protection Officers (or comparable function), where required by applicable laws. The privacy function is also responsible for deploying training and awareness programs and supporting the implementation of privacy principles into MSCERT business operations and processes. If you have questions about this Policy, please direct them to the contact details provided in privacy notice available at www.ms certification.net.

DATA BREACH REPORTING

All known or suspected incidents involving Personal Data must be reported immediately upon discovery. This includes incidents notified to MSCERT from any MSCERT associate, client, third party service provider or other business partner. MSCERT will provide education and awareness to its workforce regarding the procedures for reporting a suspected or confirmed incident. Each incident is investigated and tracked to closure.

IMPLEMENTATION

MSCERT has internal arrangements in place to ensure compliance with this Policy, to allow effective exercise of individuals' rights set out in this Policy and under applicable law, and to deal with any concerns from individuals that MSCERT may not have complied with the Policy and/or applicable law. All individuals can leverage these arrangements and/or exercise their rights by contacting their local Data Protection Officer.

CHANGES TO THE POLICY

MSCERT may update this Policy from time to time and without prior notice to individuals to reflect changes in law or privacy practices. If you have questions about this Policy, please direct them to the Head – Global Privacy Office or to the respective local Data Protection Officer, contact details of whom can be referred from privacy notice available at www.ms certification.net.