

# DATA PROTECTION POLICY

## 1. DATA PROTECTION POLICY

### 1.1 Goal of the data protection policy

Desk Nine Private Limited needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards — and to comply with the law.

### 1.2 Preamble

This data protection policy ensures Desk Nine Private Limited:

- Complies with data protection law and follow good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

### 1.3 Data Protection Law

In India DNPL is presently governed by the "*Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011*". However, in order to protect personal data of individuals across the globe, including European citizens, DNPL is also compliant with the GDPR.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

### 1.4 Data Protection Principles

Personal data must be:-

- a. Lawfulness**-processed lawfully, fairly and in a transparent manner;
- b. Purpose limitation**-collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. Adequacy**- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. Storage Limitation**- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures;

- e. **Security and confidentiality**- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

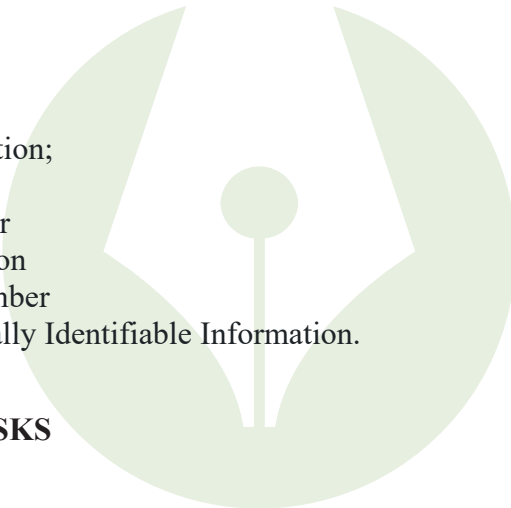
## 2. SCOPE OF THE POLICY

This policy applies to:

- The head office of Desk Nine Private Limited;
- All branches of Desk Nine Private Limited;
- All employees of Desk Nine Private Limited;
- All contractors, suppliers and other people working on behalf of Desk Nine Private Limited.

The Policy applies to all Personal Data of identifiable individuals processed by Desk Nine Private Limited. This may include but may not be limited to-

- Name;
- Age;
- Address;
- Gender;
- Financial Information;
- E-mail Address;
- Telephone Number
- Geological Location
- Identification Number
- Any other Personally Identifiable Information.



## 3. DATA PROTECTION RISKS

- Data Breach
- Risk of Reputation Loss

## 4. PEOPLE AND RESPONSIBILITIES

Everyone who works for or with Desk Nine Private Limited has some responsibility for ensuring that data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

### 1. Management

The Board of Directors and CEO are ultimately responsible for ensuring Desk Nine Private Limited meets its legal obligation;

### 2. Senior Advisor- Privacy, Legal and Product-

- a. Keeping the board updated about data protection responsibilities, risks and issues.
- b. Reviewing all data protection procedures and related policies, in line with an agreed schedule.
- c. Arranging data protection training and advice for the people covered by this policy.
- d. Handling data protection questions from staff and anyone else covered by this policy.
- e. Dealing with requests from individuals to see the data Desk Nine Private Limited holds about them (also called 'subject access requests').
- f. Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.

### 3. The IT Manager

- a. Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- b. Performing regular checks and scans to ensure security hardware and software is functioning properly.
- c. Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services

### 4. The Marketing Manager

- a. Addressing any data protection queries from journalists or media outlets like newspapers.
- b. Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

### 5. General Guidelines for Users

- a. The only people able to access data covered by this policy should be those who **need it for their work**.
- b. Data **should not be shared informally**.
- c. The User should keep all data secure, by taking sensible precautions and following the guidelines below.
- d. In particular, **strong passwords must be used** and they should never be shared.
- e. Personal data **should not be disclosed** to unauthorised people, either within the company or externally.

## 5. DATA STORAGE

1. All the User data is stored on the SignDesk AWS server.
2. This data is stored in an encrypted format.
3. SignDesk does not have any access to such data
4. All the measures of data security are taken to keep the User data safe.

Further, the User can take following measures to secure the data:

- Data should be **protected by strong passwords** that are changed regularly and never shared between employees.

- If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- All servers and computers containing data should be protected by **approved security software and a firewall**.

## 6. DATA USE

SignDesk does not sell the User data to any third party. SignDesk does not share any User data with any party outside India. SignDesk does not use the User data for any unethical, illegitimate or prohibited purposes.

## 7. SUBJECT ACCESS REQUESTS

- All individuals who are the subject of personal data held by Desk Nine Private Limited are entitled to:
- Ask **what information** the company holds about them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the company is **meeting its data protection obligations**.

Subject access requests from individuals should be made by email, addressed to Desk Nine Private Limited at [compliance@signdesk.com](mailto:compliance@signdesk.com). The data controller can supply a standard request form, although individuals do not have to use this.

Desk Nine Private Limited will always verify the identity of anyone making a subject access request before handing over any information.

In case, Desk Nine Private Limited is merely a processor of data it shall redirect the Data Subject Access request to the Data controller.

- **Disclosing Data for other reasons**

In certain circumstances, the law allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Desk Nine Private Limited will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.