

TekGenio Inc.
Privacy & Data Protection Policy
Version 1.0

Classification: Internal Use
Review Frequency: Annual

1. Purpose

This policy establishes the principles for protecting personal and confidential information processed by TekGenio while delivering ERP, AI/ML, SAP, cloud, software engineering, data analytics and data warehousing services.

2. Scope

Applies to all employees, contractors, consultants and third parties who process personal or confidential information on behalf of TekGenio or its customers.

3. Privacy Principles

TekGenio is committed to lawful, fair and transparent processing, purpose limitation, data minimisation, accuracy, storage limitation, integrity, confidentiality and accountability.

4. Roles & Responsibilities

Management oversees privacy governance. Personnel are responsible for protecting information they access and reporting suspected privacy incidents promptly.

5. Categories of Data

Data may include customer contact details, business information, technical logs, project information and other information required to deliver contracted services. Sensitive information receives additional protection.

6. Collection & Use

Only information necessary for legitimate business purposes or contractual obligations should be collected and processed.

7. Data Minimisation

The company seeks to collect the minimum amount of personal information necessary to fulfil business and legal requirements.

8. Access Control

Access to personal information is granted on a need-to-know and least-privilege basis. Access is reviewed periodically.

9. Encryption

Sensitive information should be protected using industry-standard encryption in transit and, where appropriate, at rest.

10. Data Retention

Information is retained only for as long as necessary to satisfy legal, contractual and operational requirements, after which it is securely deleted or anonymised where appropriate.

11. Data Subject Rights

Where applicable, requests relating to access, correction, deletion or other privacy rights are handled in accordance with applicable law and contractual commitments.

12. Third-Party Processing

Suppliers handling customer or personal information should be subject to appropriate contractual confidentiality and security obligations.

13. International Transfers

Where data is transferred across jurisdictions, appropriate safeguards should be implemented consistent with applicable law and customer agreements.

14. Privacy by Design

Privacy considerations should be incorporated into system design, development, testing and operational processes.

15. Incident Management

Suspected personal data breaches shall be reported immediately, investigated and managed according to the company's incident response process.

16. Training & Awareness

Personnel receive periodic privacy and information handling awareness appropriate to their roles.

17. Compliance

TekGenio strives to align with applicable contractual obligations and recognised privacy practices including GDPR principles and India's Digital Personal Data Protection Act where relevant.

18. Review

This policy is reviewed annually or when significant legal, contractual or operational changes occur.