PAJSON AGRO

PAJSON AGRO INDIA LIMITED

DATA PRIVACY POLICY

Dated: 02.11.2026

PAJSON AGRO INDIA LIMITED

1. INTRODUCTION

Pajson Agro India Limited ("Pajson") recognises the importance of protecting the privacy and personal data of individuals with whom the Company interacts in the course of its business operations.

The Company may collect and process personal data relating to its employees, prospective employees, customers, suppliers, vendors, service providers, business associates, shareholders, investors, visitors and other individuals, as may be necessary for legitimate business, contractual, legal, regulatory or other lawful purposes.

The Company is committed to processing personal data responsibly and in accordance with the applicable provisions of the Digital Personal Data Protection Act, 2023 ("DPDP Act"), rules, notifications and other applicable laws and regulations, as amended from time to time

2. PURPOSE AND OBJECTIVE

The objective of this Policy is to ensure that personal data collected or processed by the Company is handled in a lawful, fair, transparent and secure manner. The Company shall:

a. collect personal data only for specified, lawful and legitimate purposes;

b. use personal data only for the purpose for which it has been collected or for another purpose permitted under applicable law;

c. maintain appropriate safeguards for protecting personal data against unauthorised access, loss, misuse, alteration, disclosure or destruction;

d. retain personal data only for as long as necessary for the purpose for which it is processed or as required under applicable law;

e. ensure that employees and persons handling personal data understand their responsibility towards maintaining confidentiality and privacy; and

f. provide appropriate mechanisms for individuals to exercise their rights and raise grievances in accordance with applicable law.

3. SCOPE AND APPLICABILITY

This Policy applies to personal data collected or processed by the Company in connection with its business activities, including personal data relating to:

- employees and prospective employees;
- customers and prospective customers;
- suppliers, vendors and service providers;
- business associates and consultants;
- shareholders and investors;

- visitors and other persons interacting with the Company; and
- any other individual whose personal data is collected or processed by the Company.

The Policy applies irrespective of whether personal data is collected in physical, electronic or any other form.

4. PURPOSES FOR WHICH PERSONAL DATA MAY BE PROCESSED

Personal data may be processed by the Company for legitimate and identified purposes, including, as applicable:

a. recruitment, employment, payroll, attendance, employee administration and other employment-related purposes;

b. entering into and performing contracts and commercial transactions;

c. processing orders, purchases, sales, payments and other business transactions;

d. maintaining relationships with customers, suppliers, vendors, consultants and business associates;

e. complying with applicable laws, rules, regulations, orders and directions of governmental, statutory, regulatory or judicial authorities;

f. maintaining statutory, accounting, tax, financial, audit and corporate records;

g. communicating with individuals in relation to the purpose for which their information has been provided; and

h. any other specific and lawful purpose that is reasonably connected with the Company's business or obligations.

The Company shall not use personal data for a purpose that is unrelated to the original purpose of collection unless such processing is permitted by applicable law or otherwise appropriately authorised.

5. CONSENT AND OTHER LAWFUL GROUNDS

Where consent is required under applicable law, the Company shall obtain such consent in an appropriate manner.

Where personal data is processed pursuant to a contractual, statutory, legal, regulatory or other lawful requirement, the Company may process such data to the extent necessary for fulfilling such requirement.

Where consent is relied upon, the Company shall provide an appropriate mechanism for withdrawal of consent, wherever required under applicable law. Withdrawal of consent shall not affect processing already lawfully undertaken prior to such withdrawal, where permitted by law.

6. DISCLOSURE TO THIRD PARTIES

The Company may share personal data with third parties such as consultants, professional advisers, service providers, vendors, technology service providers, auditors, bankers, registrars, logistics/service partners or other persons where such sharing is reasonably necessary for a legitimate purpose of the Company.

Such disclosure shall be limited to the personal data necessary for the relevant purpose. Where appropriate, the Company shall require such third parties to maintain confidentiality and implement reasonable safeguards for the protection of personal data. Disclosure may also be made where required or permitted by applicable law, regulation, court order, governmental authority or regulatory requirement.

7. DATA RETENTION

The Company shall retain personal data only for as long as it is reasonably necessary for:

- the purpose for which the personal data was collected;
- fulfilment of contractual obligations;
- compliance with applicable statutory, regulatory, tax, accounting, employment or other legal requirements;
- establishment, exercise or defence of legal claims; or
- any other legitimate purpose permitted under applicable law.

8. RIGHTS OF DATA PRINCIPALS

Subject to applicable law, individuals whose personal data is processed by the Company may have rights relating to their personal data, including rights to:

- obtain information regarding processing of their personal data;
- seek correction or updating of inaccurate personal data;
- seek deletion of personal data where applicable;
- withdraw consent where processing is based on consent;
- raise grievances regarding the processing of their personal data; and
- exercise such other rights as may be available under applicable law.

Requests may be submitted through the contact mechanism notified by the Company.

The Company shall address such requests in accordance with applicable law and within the prescribed timelines, wherever applicable.

9. EMPLOYEE RESPONSIBILITIES

All employees and persons authorised to process personal data on behalf of the Company shall:

a. access personal data only where required for their assigned responsibilities;

b. use personal data only for authorised and legitimate purposes;

c. maintain confidentiality of personal data;

d. not share personal data with unauthorised persons;

e. take reasonable care while storing, transmitting or otherwise handling personal data;

f. promptly report any suspected data breach or unauthorised disclosure; and

g. comply with applicable Company policies, procedures and instructions relating to data privacy and information security.

Any misuse of personal data or violation of this Policy may result in appropriate action in accordance with the Company's applicable policies and terms of employment/engagement.

10. GOVERNANCE AND RESPONSIBILITY

The responsibility for implementing this Policy shall rest with the relevant functions and personnel handling personal data as part of their respective responsibilities.

The Company may designate an appropriate officer or function to coordinate data privacy matters, receive privacy-related requests and grievances, and monitor compliance with this Policy.

The Company shall not be required to establish separate data privacy committees or dedicated privacy functions unless required by applicable law, regulation or the Company's specific business requirements.

11. GRIEVANCE REDRESSAL

Any individual who has a concern regarding the collection, use, disclosure, retention or security of their personal data may raise such concern with the grievance contact of the Company available at the company website.

12. REVIEW

This policy shall be reviewed time to time to check for its effectiveness, changes in technology /amendments in DPDP Act 2023, and/or changes in risk levels that may impact privacy, legal & contractual requirements, and business efficiency.