

# **K.P. ENERGY LIMITED**

## POLICY ON DATA PRIVACY AND CYBER SECURITY

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## 1. INTRODUCTION:

K.P. Energy Limited (hereafter referred to as the 'Company') recognizes the importance of protecting its information, cyber assets, and personal data entrusted by employees, customers, associates, and business partners. The Company is committed to maintaining high standards of cyber security and data privacy to safeguard these assets from unauthorized access, misuse, and security breaches.

This policy outlines Company's approach to cyber security and data privacy by ensuring confidentiality, integrity, and availability of its information and cyber assets while protecting personal data from unauthorized use and disclosure.

## 2. OBJECTIVES:

The objective of Policy includes:

- To protect information, cyber assets, and personal data from unauthorized access, threats, and breaches.
- To adhere to Cyber Security and Data Privacy laws, regulations and industry practices, standards for adopting procedures and implementing systems designed for securing and protecting data.
- To foster trust and confidence among customers, partners, and stakeholders which strengthens relationships and enhances its reputation as a trustworthy custodian of data.
- To establish procedures and protocols for responding to data breaches, cyberattacks, or other security incidents promptly and effectively.
- To maintain and promote transparency with stakeholders, including customers and employees.
- To identify and mitigate cyber security risks through a formal risk management process

## 3. SCOPE & APPLICABILITY:

This policy applies to all Company's employees, contractors, vendors, service providers, third-party consultants, associates, customers, and business partners who:

- Access, process, store, or transmit Company's data, information, and cyber assets.
- Provide personal information to Company or handle personal data on Company's behalf.
- Use Company's computer, communication, and cyber systems, whether owned or licensed.

This policy covers all Company's business operations, ensuring the confidentiality, integrity, and availability of cyber assets and data privacy measures.

#### 4. POLICY STATEMENT

Company shall implement the following principles to ensure cyber security and data privacy:

##### *Cyber Security Measures:*

- Risks to information and cyber systems shall be identified and mitigated to an acceptable level through a formal risk management process.
- Critical information shall be protected from unauthorized access, use, disclosure, modification, and disposal.
- Cyber security incidents, actual or suspected, shall be reported and investigated promptly, with corrective and preventive actions taken.
- All applicable cyber security standards, legal, statutory, and regulatory requirements shall be complied with.
- Awareness programs on cyber security shall be provided to employees and third parties where applicable.

##### *Data Privacy Measures:*

- Company shall collect and process personal data only for identified business purposes, in accordance with the privacy notice and applicable laws.
- Personal data shall not be retained longer than necessary and shall be securely disposed of when no longer needed.
- Personal data shared with third parties shall be disclosed securely, ensuring adequate protection and compliance with applicable laws.
- Company shall implement data protection mechanisms to safeguard personal information from unauthorized access and data breaches.

#### 5. COMPLIANCE & RESPONSIBILITIES

- All employees must understand and adhere to the Cyber Security and Data Privacy Policy.
- Business Heads/Department Heads are responsible for ensuring compliance within their respective domains.
- Third-party vendors, processors, and sub-processors handling Company's information must comply with Company's security and privacy requirements.

- Company reserves the right to take disciplinary action in case of non-compliance or violations of this policy.

## 6. REVIEW & UPDATES

This policy will be periodically reviewed to ensure effectiveness, address changes in technology, assess new risks, and comply with evolving legal, regulatory, and contractual requirements.

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