

Data Protection Policy

1. Introduction

Inazuma.co is committed to protecting the privacy and security of personal data. This Data Protection Policy ("Policy") outlines our obligations and practices for handling personal data in accordance with the Digital Personal Data Protection Act, 2023 ("DPDP Act") and other applicable laws and regulations. This Policy applies to all Inazuma.co employees, contractors, and any third parties processing personal data on our behalf. It is designed to ensure that all personal data is collected, used, stored, and disposed of in a manner that respects individual privacy rights and complies with legal requirements. Inazuma.co recognizes the importance of maintaining trust and confidence in our handling of data, and this Policy is a cornerstone of our commitment to responsible data management.

2. Purpose and Objectives

The purpose of this Policy is to:

- Establish a framework for Inazuma.co's processing of personal data, ensuring that it is carried out lawfully, fairly, and transparently.
- Define the types of personal data

that Inazuma.co collects and processes, and the purposes for which this data is used.

- Outline the rights of individuals ("Data Principals") with respect to their personal data, and the procedures for exercising those rights.
- Ensure that appropriate security measures are in place to protect personal data against unauthorized access, use, or disclosure.
- Define the responsibilities of Inazuma.co employees and contractors in relation to the processing of personal data.
- Provide guidance on the transfer of personal data to third parties, including cross-border transfers.
- Establish procedures for responding to data breaches and notifying affected parties and regulatory authorities.
- Promote a culture of data protection awareness within Inazuma.co.
- Ensure compliance with all applicable data protection laws and regulations, including the DPDP Act.
- Provide a mechanism for regular review and updating of data protection practices.

3. Scope

This Policy applies to:

- All personal data processed by Inazuma.co, regardless of the format in which it is held (e.g., electronic, paper, or other media).
 - All processing activities carried out by Inazuma.co, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure or destruction.
 - All Inazuma.co employees, directors, officers, contractors, agents, and any other individuals or entities authorized to process personal data on behalf of Inazuma.co.
 - All third parties who process personal data on behalf of Inazuma.co, including but not limited to vendors, service providers, and partners.
 - All information systems, databases, applications, and networks used to process personal data.
 - All locations where Inazuma.co operates, including offices, data centers, and remote work locations.
- **Personal Data:** Any information relating to an identified or identifiable natural person ('Data Principal'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
 - **Data Principal:** The individual to whom personal data relates.
 - **Data Fiduciary:** The person who alone or in conjunction with other persons determines the purposes and means of the processing of personal data. Inazuma.co is the Data Fiduciary under this Policy.
 - **Data Processor:** A person who processes personal data on behalf of the Data Fiduciary.
 - **Processing:** Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure or

4. Definitions

For the purposes of this Policy, the following definitions shall apply:

destruction.

- **Consent:** Voluntary, specific, informed and unambiguous indication of the Data Principal's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- **Data Breach:** Any unauthorized access, acquisition, disclosure, loss, destruction, or alteration of personal data.
- **Designated Officer:** An individual designated by Inazuma.co to be responsible for overseeing the implementation of and compliance with this Policy.
- **Supervisory Authority:** The Data Protection Board of India or any other relevant regulatory authority responsible for overseeing data protection.
- **Recipient:** A natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.
- **Third Party:** A natural or legal person, public authority, agency or body other than the Data Principal, Data Fiduciary, Data Processor and persons who, under the direct authority of the Data Fiduciary or Data Processor, are authorized to process personal data.

5. Data Protection Principles

Inazuma.co shall adhere to the following principles when processing personal data:

- **Lawfulness, Fairness and Transparency:** Personal data shall be processed lawfully, fairly, and in a transparent manner in relation to the Data Principal.
 - Lawfulness: Processing shall be lawful only if, and to the extent that, processing is based on consent of the Data Principal or for some other lawful basis.
 - Fairness: Processing shall be fair, meaning that Inazuma.co shall process data in a way that Data Principals would reasonably expect and not use it in ways that have unjustified adverse effects on them.
 - Transparency: Inazuma.co shall provide Data Principals with clear and easily understandable information about how their personal data is processed.
- **Purpose Limitation:** Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
 - Inazuma.co will clearly define the purposes for which it collects personal data before the data is collected.
 - If Inazuma.co wishes to use the

data for a new purpose, it will obtain fresh consent from the Data Principal, unless the new purpose is compatible with the original purpose.

- **Data Minimization:** Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
 - Inazuma.co will only collect the minimum amount of personal data that it needs to fulfill the specified purpose.
 - Inazuma.co will regularly review its data collection practices to ensure that it is not collecting excessive data.
- **Accuracy:** Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
 - Inazuma.co will implement procedures to ensure data accuracy, including regular data quality checks and providing Data Principals with the ability to update their information.
- **Storage Limitation:** Personal data shall be kept in a form which permits identification of Data Principals for no longer than is

necessary for the purposes for which the personal data are processed.

- Inazuma.co will establish data retention schedules that specify how long different types of personal data will be retained.
- Once the retention period expires, the data will be securely deleted or anonymized.
- **Integrity and Confidentiality:** Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.
 - Inazuma.co will implement robust security measures to protect personal data, including access controls, encryption, and regular security assessments.
- **Accountability:** The Data Fiduciary shall be responsible for and be able to demonstrate compliance with the principle relating to processing of personal data.
 - Inazuma.co will maintain records of its processing activities and will be able to

demonstrate that its processing activities comply with this Policy and the DPDPA.

6. Lawful Basis for Processing

Inazuma.co will only process personal data when there is a lawful basis for doing so. The lawful bases for processing personal data under this Policy are:

- **Consent:** The Data Principal has given consent to the processing of his or her personal data for one or more specific purposes.
 - Consent must be freely given, specific, informed and unambiguous.
 - Inazuma.co will provide Data Principals with clear and concise information about the purposes of the processing and will obtain their consent through a clear affirmative action.
 - Data Principals have the right to withdraw their consent at any time.
- **For a specific purpose:** The processing is necessary for the specific purpose.
 - Inazuma.co will process personal data for the specific purpose for which it was collected.
- **Compliance with legal obligation:** The processing is

necessary for compliance with a legal obligation to which Inazuma.co is subject.

- If Inazuma.co is required by law to process personal data, it will do so in accordance with the law.

7. Data Principal Rights

Inazuma.co respects the rights of Data Principals with regard to their personal data. Data Principals have the following rights:

- **Right to Confirmation:** Data Principals have the right to obtain from the Data Fiduciary confirmation as to whether or not personal data concerning him or her are being processed.
 - Inazuma.co will provide confirmation to Data Principals upon request, as to whether their personal data is being processed.
- **Right to Access:** Data Principals have the right to access their personal data.
 - Data Principals can request a copy of their personal data that Inazuma.co holds. Inazuma.co will provide this information in a structured, commonly used and machine-readable format.
- **Right to Rectification:** Data Principals have the right to obtain from the Data Fiduciary without

- undue delay the rectification of inaccurate personal data concerning him or her.
- Inazuma.co will correct any inaccurate or incomplete personal data upon request.
- **Right to Erasure ('Right to be Forgotten')**: Data Principals have the right to obtain from the Data Fiduciary the erasure of personal data concerning him or her without undue delay and the Data Fiduciary shall have the obligation to erase personal data without undue delay.
 - Data Principals can request that their personal data be deleted under certain circumstances, such as when the data is no longer necessary for the purpose for which it was collected, or when the Data Principal withdraws consent.
- **Right to Restriction of Processing**: Data Principals have the right to obtain from the Data Fiduciary restriction of processing where one of the following applies:
 - the accuracy of the personal data is contested by the Data Principal, for a period enabling the Data Fiduciary to verify the accuracy of the personal data;
 - the processing is unlawful and the Data Principal opposes the erasure of the personal data and requests the restriction of their use instead;
- the Data Fiduciary no longer needs the personal data for the purposes of the processing, but they are required by the Data Principal for the establishment, exercise or defense of legal claims;
 - the Data Principal has objected to processing.
- **Right to Data Portability**: Data Principals have the right to receive the personal data concerning him or her, which he or she has provided to a Data Fiduciary, in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data Fiduciary without hindrance from the Data Fiduciary to which the personal data have been provided.
 - Inazuma.co will provide data portability to Data Principals upon request.
- **Right to Object**: Data Principals have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her.
 - Inazuma.co will cease processing the personal data unless Inazuma.co demonstrates compelling legitimate grounds for the

processing which override the interests, rights and freedoms of the Data Principal.

- **Right to Withdraw Consent:** The Data Principal shall have the right to withdraw his or her consent at any time.
 - Inazuma.co will inform Data Principals of their right to withdraw consent and will have a simple process in place for Data Principals to do so.

8. Data Transfers to Third Parties

Inazuma.co may transfer personal data to third parties, including Data Processors, only under the following circumstances:

- **With the consent of the Data Principal:** Inazuma.co will obtain the Data Principal's consent before transferring their data to a third party, unless another lawful basis applies.
- **For a specific purpose:** The transfer is necessary for the specific purpose.
- **To Data Processors:** Inazuma.co may transfer personal data to Data Processors who process data on our behalf. In such cases, Inazuma.co will:
 - Select Data Processors who provide sufficient guarantees to implement appropriate technical and organizational measures to protect the data.

- Enter into a written contract with the Data Processor that includes specific data protection obligations.
- Ensure that the Data Processor processes the data only in accordance with Inazuma.co's instructions.

- **For compliance with a legal obligation:** The transfer is necessary for compliance with a legal obligation to which Inazuma.co is subject.

9. Cross-Border Data Transfers

Inazuma.co may transfer personal data to countries outside India. Inazuma.co will comply with the requirements of the DPDP Act and other applicable laws regarding cross-border data transfers. This may include:

- Transferring data to countries that have been deemed to provide an adequate level of data protection.
- Implementing appropriate safeguards, such as standard contractual clauses approved by the Data Protection Board of India.
- Obtaining the consent of the Data Principal for the transfer.

10. Data Security Measures

Inazuma.co will implement appropriate technical and organizational measures to ensure the security of personal data, including protection against unauthorized or unlawful processing

and against accidental loss, destruction or damage. These measures shall be based on a risk assessment and shall take into account the state of the art, the costs of implementation and the nature, scope, context and purposes of the processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons. The measures may include:

- **Access Control:** Restricting access to personal data to authorized personnel only, using measures such as:
 - Strong passwords and regular password changes
 - Multi-factor authentication
 - Role-based access control
 - Principle of least privilege
 - Secure log-in procedures
 - Automatic logoff
- **Data Encryption:** Encrypting personal data both in transit and at rest, using strong encryption algorithms.
- **Data Loss Prevention (DLP):** Implementing measures to prevent sensitive data from leaving Inazuma.co's control without authorization.
- **Intrusion Detection and Prevention Systems:** Using systems to monitor and detect unauthorized access to Inazuma.co's systems and data.
- **Firewalls:** Implementing firewalls

to protect Inazuma.co's network from unauthorized access.

- **Regular Security Assessments:** Conducting regular security assessments and audits to identify and address vulnerabilities.
- **Vulnerability Management:** Implementing a process for identifying, assessing, and remediating security vulnerabilities in a timely manner.
- **Patch Management:** Ensuring that all systems and software are kept up to date with the latest security patches.
- **Data Backups:** Performing regular backups of personal data and storing them securely.
- **Physical Security:** Protecting the physical security of data processing facilities and equipment.
- **Security Awareness Training:** Providing regular training to employees on data protection principles and best practices.

11. Roles and Responsibilities

- **Designated Officer:** The Designated Officer shall be responsible for overseeing the implementation of and compliance with this Policy. The responsibilities of the Designated Officer include:
 - Developing and maintaining this Policy and related procedures.
 - Providing guidance and advice

- to employees on data protection issues.
- Handling data subject requests.
 - Cooperating with the Supervisory Authority.
 - Managing data breach response.
 - Conducting data protection impact assessments (DPIAs).
 - Monitoring compliance with this Policy.
 - Providing training to employees on data protection.
- **Employees and Contractors:** All employees and contractors of Inazuma.co are responsible for:
 - Processing personal data in accordance with this Policy.
 - Protecting the confidentiality and security of personal data.
 - Reporting any suspected data breaches or data protection violations to the Designated Officer.
 - Completing required data protection training.
 - **Management:** Senior management is responsible for:
 - Ensuring that adequate resources are available for data protection.
 - Promoting a culture of data protection within Inazuma.co.
 - Reviewing and approving this Policy.
 - Supporting the Designated Officer in their duties.
- ## 12. Data Breach Response
- In the event of a data breach, Inazuma.co will take the following steps:
- **Containment:** Take immediate steps to contain the breach and prevent further data loss.
 - **Investigation:** Conduct a thorough investigation to determine the cause of the breach, the extent of the data affected, and the potential risks.
 - **Notification:** Notify the Supervisory Authority and affected Data Principals as required by the DPDP Act and other applicable laws.
 - **Remediation:** Implement measures to address the root cause of the breach and prevent future breaches.
 - **Documentation:** Document the breach and the actions taken in response.
- ## 13. Training
- Inazuma.co will provide regular training to all employees and contractors who process personal data. The training will cover:
- The requirements of the DPDP Act and other applicable laws.
 - This Policy and related procedures.
 - The principles of data protection.

- The rights of Data Principals.
- How to identify and report data breaches.
- Data security best practices.
- Employee responsibilities under this Policy.

14. Audit and Review

Inazuma.co will conduct regular audits and reviews of its data protection practices to ensure compliance with this Policy and applicable laws. The audits will be conducted by internal or external auditors, and the results will be reported to senior management. This Policy will be reviewed and updated at least annually, or more frequently as needed, to reflect changes in laws, regulations, or Inazuma.co's data processing practices.

15. Policy Dissemination and Enforcement

This Policy will be made available to all employees and contractors of Inazuma.co. Employees and contractors will be required to acknowledge that they have read and understood this Policy. Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment or contract.

16. Data Protection Impact Assessments (DPIAs)

Inazuma.co will conduct DPIAs for any processing that is likely to result in a high risk to the rights and freedoms of Data Principals. DPIAs will be conducted before the processing begins, and will include:

- A description of the processing operations.
- An assessment of the necessity and proportionality of the processing.
- An evaluation of the risks to the rights and freedoms of Data Principals.
- The measures envisaged to address the risks.

17. Record Keeping

Inazuma.co will maintain records of its processing activities as required by the DPDP Act. These records will include:

- The categories of Data Principals and personal data processed.
- The purposes of the processing.
- The recipients or categories of recipients to whom the personal data have been or will be disclosed.
- Cross-border data transfers.
- The security measures implemented.

18. Cooperation with Supervisory Authority

Inazuma.co will cooperate with the Data Protection Board of India and any

other relevant supervisory authorities in the performance of their tasks.

19. Grievance Mechanism

Inazuma.co will establish a grievance mechanism to address complaints from Data Principals regarding the processing of their personal data. Data Principals may submit complaints to the Designated Officer, and Inazuma.co will investigate and respond to such complaints in a timely manner.

