## udai.io — Data Privacy & Confidentiality Policy

Version: 1.0 | Effective Date: 2025-09-19 | Owner: People & Operations

#### 1. Purpose

Establish principles and controls for processing personal data and protecting confidential information at udai.io.

#### 2. Definitions

Personal Data: any information that relates to an identified or identifiable individual. Confidential Information: non-public information belonging to udai.io or its customers.

## 3. Principles of Processing

Lawfulness, fairness, transparency; purpose limitation; data minimization; accuracy; storage limitation; integrity and confidentiality; accountability.

## 4. Data Subject Rights

Where applicable, honor rights of access, rectification, erasure, restriction, portability, and objection. Route requests to Privacy/Legal within required timeframes.

#### 5. Legal Bases & Notices

Identify a valid legal basis before processing personal data (e.g., contract, consent, legitimate interests). Provide clear notices and obtain consent where required.

#### 6. Collection, Use & Retention

Collect only what is necessary. Retain data per the retention schedule; securely dispose when no longer needed.

### 7. Sharing & Third Parties

Use DPAs with processors; perform privacy/security due diligence; restrict cross-border transfers to compliant mechanisms.

### 8. Security of Processing

Apply encryption, access controls, and monitoring proportionate to risk. Report incidents immediately; follow the Incident Response process.

#### 9. Confidential Information & NDAs

Protect trade secrets, source code, customer lists, and financials. Use NDAs with external parties before sharing sensitive information.

# 10. Breach Notification

Escalate suspected personal data breaches immediately. Coordinate notifications to regulators and affected individuals as required by law and contracts.

# 11. Training & Accountability

All personnel must complete annual privacy and security training. Managers ensure policy adherence within their teams.

# 12. Revision History

Version 1.0 — Initial publication.