

SRI SAI SAMARDHA SOLUTIONS PVT. LTD

Regd. Off: Plot No. 46 A, Western Hills, Addagutta Society,
Near Narayana Concept School, Opp JNTU University, KPHB Colony, Hyderabad-72.
E-mail : sankarbabu@ssst.in.net

DATA PROTECTION & PRIVACY POLICY

Effective Date: 18-06-2022

Last Reviewed Date: 24-04-2026

Reviewed By: Sankar Babu

Designation: CEO

Signature: _____

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LEGAL STATEMENT & SCOPE

This Policy governs the collection, processing, transmission, storage, and security of Personal Data and Corporate Data processed by **Sri Sai Samardha Solutions Pvt. Ltd.** during operational delivery to clients. The organization enforces physical, electronic, and managerial measures to safeguard confidential information.

1. ORGANIZATIONAL GOVERNANCE & ACCOUNTABLE ROLES

Direct organizational oversight and accountability are established under the following structure:

- **Chief Executive Officer (CEO - Sankar Babu):** Holds ultimate executive accountability for policy approval, organizational compliance, and regulatory/client escalations.
- **Data Governance & Security Lead (IT & Operations Lead):** Accountable for daily operational compliance, access permissions, system monitoring, and serving as the primary liaison for client TPR risk audits.
- **System & Network Administrator:** Responsible for implementing network boundary controls, active firewalls, SSL certificates, and technical encryption standards.
- **All Employees & Operators:** Accountable for strict adherence to data protection standards, credential confidentiality, and immediate reporting of potential data events.

2. DATA PRIVACY PRINCIPLES & PURPOSE LIMITATION

- **Legitimate Collection:** Personal data is collected solely for specified, necessary operational purposes (e.g., employee rosters, transport logistics, operational analytics, billing).
- **Purpose Limitation:** Personal data shall not be used or processed beyond the explicit purpose specified at collection without prior written authorization.
- **Data Minimization:** Data collection is strictly restricted to the minimum required to fulfil contractual obligations.

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3. TECHNICAL DATA SECURITY CONTROLS

- **Encryption in Transit:** All personal or sensitive client data transmitted over internet connections must utilize Secure Socket Layer (SSL) / TLS protocols supporting a minimum of 128-bit encryption technology.
- **Encryption at Rest:** Sensitive identifiers and verification records (including eKYC data) are encrypted at rest utilizing the AES-256-bit encryption standard.
- **Network & Server Protection:** Web servers, databases, and operational endpoints operate behind active firewalls and are continuously monitored to prevent unauthorized access, erasure, or modification.

4. SECURE COMMUNICATIONS PROTOCOL

- **Ordinary Email Restrictions:** Unencrypted ordinary email shall not be used to transmit sensitive personal information, credentials, or confidential financial metrics.
- **Secure Facilities:** Any dispatch of sensitive data must occur via encrypted channels, secure client portals, or secure email transmission facilities.

5. DATA RETENTION & STATUTORY COMPLIANCE

- **Retention Period:** Personal and corporate data will not be retained longer than necessary for contractual execution, statutory compliance, or legal requirements.
- **Sanitization & Disposal:** Decommissioned data or hardware undergoes secure electronic wiping or physical destruction in compliance with applicable statutory guidelines.

6. THIRD-PARTY DISCLOSURES & PRIOR CLIENT APPROVAL

- **Prior Written Authorization:** The organization shall not transfer, disclose, or sub-process any client personal or corporate data to any third party or fourth party without prior notice and formal written approval from the client.
- **Binding Obligations:** Approved third parties must execute a formal Data Processing Agreement enforcing confidentiality and equivalent security standards.

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7. SECURITY INCIDENT & DATA BREACH MANAGEMENT

- **Internal Reporting:** Any suspected or confirmed loss, unauthorized access, or compromise of data must be reported to the Data Governance Lead within 1 hour.
- **Client Escalation:** The client will be formally notified in writing within 24 hours of confirmation of any breach or security incident impacting client data.
- **Remediation & Reporting:** Impact assessments, root-cause analyses, and corrective actions shall be documented and shared with the client.

8. COMPLIANCE, AUDITS & GOVERNANCE

- **Independent Audits:** The organization undergoes annual internal privacy assessments and fully cooperates with client-led independent audits.
- **Penalties:** Non-compliance with this policy leads to immediate disciplinary action, up to and including termination of employment and legal prosecution.