

HAPPY FORGINGS LIMITED's

DIGITAL PERSONAL DATA PROTECTION POLICY

Version	Approval date	Description
Version 1	February 9, 2026	Original Policy

1. Purpose of this Policy

This Digital Personal Data Protection Policy (“Policy”) is issued by Happy Forgings Limited (“Company”, “we”, “us”, “our”) as a public notice in compliance with the Digital Personal Data Protection Act, 2023 (DPDP Act).

This Policy explains how the Company collects, uses, stores, discloses, and protects personal data of all individuals who interact with the Company, including employees, workers, directors, shareholders, customers, vendors, suppliers, consultants, service providers, visitors, and any other persons (collectively referred to as “Data Principals”).

2. Applicability

This Policy applies to all personal data:

- Collected in digital form or
 - Collected in non-digital form and subsequently digitised,
- by or on behalf of the Company in the course of its business and statutory activities.

3. Categories of Data Principals Covered

This Policy covers personal data relating to, including but not limited to:

- Employees, workers, trainees, consultants and directors
- Shareholders and beneficial owners
- Customers and prospective customers
- Vendors, suppliers, contractors and service providers
- Dealers, distributors and business partners
- Visitors to Company premises and users of Company systems or website

4. Types of Personal Data Collected

The Company may collect and process the following categories of personal data, as applicable:

- Identity data (name, address, date of birth, photograph)
- Contact details (phone number, email address)
- Government-issued identifiers (PAN, Aadhaar where legally permitted)
- Financial and banking information
- Employment-related data (salary, attendance, performance records)

- Shareholding and investment-related information
- Statutory compliance data under applicable laws
- Any other personal data required for lawful business or statutory purposes.

5. Purpose and Lawful Basis for Processing

The Company processes personal data strictly for lawful and legitimate purposes, including:

- Compliance with applicable laws and regulations, including but not limited to the Companies Act, 2013, Income-tax Act, 1961, labour and employment laws, SEBI regulations, and other statutory requirements
- Administration of employment, payroll, benefits, and human resource functions
- Maintenance of statutory registers, records and filings
- Execution and management of contracts and business relationships
- Accounting, auditing, and internal governance
- Security, access control, and prevention of fraud

6. Legal Basis

Personal data is processed:

- Without consent, where such processing is required for compliance with any law for the time being in force or for performance of contractual or employment-related obligations; and
- With consent, where data is voluntarily provided for purposes not mandated by law.

Where personal data is required to be provided under applicable law, such data shall be deemed mandatory, and rights such as withdrawal of consent or erasure shall be limited to the extent permitted by law.

7. Deemed Consent

By voluntarily providing personal data to the Company, including through physical forms, electronic submissions, emails, portals, or any other means, the Data Principal acknowledges and agrees that:

- The personal data is provided for lawful and legitimate purposes.
- The Company is authorised to process such data in accordance with this Policy and applicable laws; and
- Such provision of data shall be treated as consent or deemed consent, wherever applicable under the DPDP Act.

8. Data Retention and Erasure

The Company shall retain personal data:

- For such period as required under applicable laws or
- For as long as necessary to fulfil the purpose for which it was collected.

Personal data that is required to be retained under statutory or regulatory requirements cannot be erased or deleted, even upon request, until the applicable retention period expires.

Requests for erasure shall be considered only in respect of non-mandatory and non-statutory personal data.

9. Data Sharing and Disclosure

Personal data may be shared only:

- With government authorities, regulators, or statutory bodies, where required by law.
- With auditors, advisors, banks, and service providers for lawful business purposes.
- With third-party processors acting on behalf of the Company, subject to appropriate contractual safeguards.

The Company does not sell personal data.

10. Data Security Measures

The Company implements reasonable technical and organisational safeguards to protect personal data, including:

- Access controls and authorisation mechanisms
- Password protection and system security
- Restricted access on a need-to-know basis
- Periodic review of security practices

11. Use of Logos, Trademarks and Brand Identifiers

The Company may, in the course of its business, use logos, trademarks, brand names or other brand identifiers belonging to its customers, vendors, suppliers, business partners or other third parties (“Brand Assets”).

Brand Assets shall be used only for legitimate business purposes such as client references, statutory disclosures, marketing materials, websites, presentations or credentials, and shall not be used in a misleading or unauthorised manner.

Any party whose Brand Assets are proposed to be used may withdraw such consent by written communication, subject to contractual or legal limitations.

12. Rights of Data Principals

Subject to applicable laws, Data Principals may request:

- Access to their personal data
- Correction or updating of inaccurate data
- Grievance redressal

The right to withdraw consent or seek erasure shall not apply to personal data processed for statutory or legal obligations.

13. Policy Updates

The Company reserves the right to modify or update this Policy from time to time to reflect changes in law, regulations, or business practices. The updated Policy shall be made available on the Company's website.

14. Governing Law

This Policy shall be governed by and construed in accordance with the laws of India.

By interacting with or sharing personal data with the Company, all Data Principals acknowledge that they have read, understood, and agreed to this Policy.