



SHRI KRISHANA OVERSEAS PLC (the "Company")

DATA PROTECTION POLICY

1. Overview

The Company recognizes everyone's right to privacy. In order to maintain consumer trust and adhere to applicable laws, the Company acknowledges the importance of protecting the privacy and security of personal data. Therefore, this Policy provides the rules of personal data protection and other third parties in ensuring responsible processing of personal data.

2. Purpose

2.1 The purpose of this Policy is to provide guidelines on how the Company shall process the personal data of its staff, suppliers and other third parties in order to ensure compliance with data protection law and to protect the data subject's rights.

3. Applicability

3.1 This policy applies to:

- a) All personal data collected, stored, processed, or transmitted by the Company in any format;
- b) All Company staff (permanent, fixed term and temporary/ casual employees, interns and directors);
- c) All individuals who deal with the Company including third-party representatives, agents and representatives who are carrying out any work for or behalf of the Company, operators, service providers, contractors and any associated third parties who handle and use Personal Data for or on behalf of the company in any format (hereinafter "Third Parties"); and
- d) All data processed by the Company in an automated or non-automated manner and whether in manual, electronic or any other form.

All Employees and third parties who process Personal Data on behalf of the company are expected to comply with the company's legal obligations in so far as they relate to the handling and processing of Personal Data.

4. Definition of terms

4.1 "Applicable Laws" means the Data Protection Act and the Regulations;

4.2 "Company" means Shri Krishana Overseas Plc;



- 4.3 **“Consent”** means any manifestation of express, unequivocal, free, specific and informed indication of the data subject’s wishes by a statement or by a clear affirmative action, signifying agreement to the processing of personal data relating to the data subject;
- 4.4 **“Data subject”** means an identified or identifiable natural person who is the subject of personal data;
- 4.5 **“Personal Data”** means any information relating to an identified or identifiable natural person who may be identified either directly or indirectly using a name, identification number, location information, online identifier, or one or more characteristics that are unique to their physical, physiological, genetic, mental, economic, cultural or social identity;
- 4.6 **“Personal Data Breach”** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed;
- 4.7 **“Processing”** means any operation or sets 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 or use; disclosure by transmission, dissemination, or otherwise making available; or alignment or combination, restriction, erasure or destruction.
- 4.8 **“Regulations”** means the Data Protection (General) Regulations, 2021;
- 4.9 **“Sensitive personal data”** means data revealing the natural person's race, health status, ethnic social origin, conscience, belief, genetic data, biometric data, property details, marital status, family details including names of the person's children, parents, spouse or spouses, sex or the sexual orientation of the Data Subject; and
- 4.10 **“Third party”** means a natural or legal person, public authority, agency or other body, other than the data subject, data controller, the Company or persons who, under the direct authority of the Company, are authorized to process Personal Data.

5. Principles of data protection

5.1 The Company shall ensure that personal data:

- (a) Processed in accordance with the right to privacy of the data subject;
- (b) Processed lawfully, fairly and in a transparent manner in relation to any data subject;
- (c) Collected for explicit, specified and legitimate purposes and not further processed in a manner incompatible with those purposes;



- (d) Adequate, relevant, limited to what is necessary in relation to the purposes for which it is processed;
- (e) Collected only where a valid explanation is provided whenever information relating to family or private affairs is required;
- (f) Accurate and, where necessary, kept up to date, with every reasonable step being taken to ensure that any inaccurate personal data is erased or rectified without delay;
- (g) Kept in a form which identifies the data subjects for no longer than is necessary for the purposes which it was collected; and
- (h) Not transferred outside Kenya, unless there is proof of adequate data protection safeguards or consent from the data subject.

6. Rights of a Data Subject

6.1 A data subject shall have the right to:

- (a) Be informed of the use to which their personal data is to be put;
- (b) Withdraw consent to the processing of personal data at any time;
- (c) Access their personal data in custody of the Company;
- (d) Object to the processing of all or part of their personal data;
- (e) The correction of false or misleading data; and (f) Deletion of false or misleading data about them.

7. Collection of Personal Data

7.1 The Company may collect personal data directly from the Data Subject or indirectly where: -

- a) The data is contained in a public record;
- b) The data subject has deliberately made the data public;
- c) The data subject has consented to the collection from another source;
- d) The data subject has an incapacity and the guardian appointed has consented to the collection from another source;
- e) The collection from another source would not prejudice the interests of the data subject.

7.2 The Company shall collect data from another source if data is necessary for:

- a) The prevention, detection, investigation, prosecution and punishment of crime;
- b) The enforcement of a law which imposes a pecuniary penalty; or
- c) The protection of the interests of the data subject or another person.

7.3 The Company shall collect, store or use personal data for a lawful, specific and explicitly defined purpose.



8. Duty to notify

8.1 The Company shall, before collecting personal data, in so far as practicable, inform the data subject of:

- a) The rights of the data subject as specified under Article 26 of DPA No. 24 of 2019;
- b) The fact that personal data is being collected;
- c) The purpose for which the personal data is being collected;
- d) The third parties whose personal data has been or will be transferred to, including details of safeguards adopted;
- e) The third-party contacts and whether any other entity may receive the collected personal data;
- f) A description of the technical and organizational security measures taken to ensure the integrity and confidentiality of the data;
- g) The data being collected pursuant to any law and whether such collection is voluntary or mandatory; and
- h) The consequences, if any, where the data subject fails to provide all or any part of the requested data.

9. Lawful processing of Personal Data

9.1 The Company shall not process personal data unless;

- a) The data subject consents to the processing for one or more specified purposes; or
- b) The processing is necessary for;
 - i. Performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject before entering into a contract;
 - ii. Compliance with any legal obligation to which the Company is subject;
 - iii. Protection of the vital interests of the Data Subject or another Data Subject;
 - iv. Performance of a task carried out in the public interest or in the exercise of official authority vested in the Company;
 - v. Performance of any task carried out by a public authority;
 - vi. The exercise, by any person in the public interest, of any other functions of a public nature;
 - vii. The legitimate interests pursued by the University by a third party to whom the data is disclosed, except if the processing is unwarranted in any particular case having regard to the harm and prejudice to the rights and freedoms or legitimate interests of the data subject; or
 - viii. The purpose of historical, statistical, journalistic, literature and art or scientific research.



- c) Further processing of personal data shall be in accordance with the purpose of collection.
- d) A third party who contravenes the provisions of sub-section (b) commits an offence.

10. Sharing Personal Data

- 10.1 The Company may share personal data with any of its third-party service providers whose services are necessary to perform the Company's obligations.
- 10.2 Personal data will not be shared with any Third Parties, unless there is a legitimate company need to share the personal data; sharing of the personal data with third parties has been communicated with the Data Subject beforehand; and the person receiving the information has agreed to keep the personal data confidential and to use it only for the purpose for which it was shared under a data transfer agreement.

11. Consent

- 11.1 The Company shall maintain adequate records to show that consent was obtained before personal processing data. Such data will not be processed after the withdrawal of consent by a data subject.

12. Security

- 12.1 The Company has put in place appropriate technical and organisational measures to implement the data protection principles in an effective manner. Employees must maintain data security by protecting the confidentiality, integrity and availability of personal data.

13. Approval and Review of Policy

- 13.1 This Policy was reviewed by the Board on ...25/09/2025.....
- 13.2 The Board will review the Policy periodically to ensure it is up to date with applicable laws and best practices.


CHAIRMAN


MANAGING DIRECTOR/CEO

Dated:25/09/2025