

Data Processing Agreement (DPA) & Standard Contractual Clauses (SCC) Policy

Anant Medicare & Legal Services Private Limited (AMLS Pvt. Ltd.)

1. Purpose

Anant Medicare & Legal Services Private Limited ("AMLS", "Company", "we", "our", or "us") is committed to protecting personal data and ensuring compliance with applicable data protection laws, including the Digital Personal Data Protection Act, 2023 (DPDP Act), contractual obligations, and industry best practices.

This Data Processing Agreement (DPA) and Standard Contractual Clauses (SCC)-Like Policy establishes the framework governing the collection, processing, storage, transfer, sharing, and protection of personal data handled by the Company while providing investigation, verification, background screening, insurance claim investigation, due diligence, and related services.

2. Scope

This Policy applies to:

- All employees, directors, consultants, field officers, contractors, and agents of AMLS.
- All personal data processed on behalf of clients.
- All subcontractors, service providers, and third-party processors engaged by AMLS.
- All information systems, applications, devices, and records used in Company operations.

3. Definitions

Personal Data: Any information relating to an identified or identifiable individual.

Data Principal: The individual to whom the personal data relates.

Data Fiduciary/Controller: The client or organization determining the purpose and means of processing personal data.

Data Processor: AMLS when processing personal data on behalf of clients.

Processing: Collection, recording, storage, use, sharing, transmission, verification, analysis, deletion, or destruction of personal data.

4. Roles and Responsibilities

AMLS as Data Processor

Where AMLS processes personal data on behalf of clients, the Company shall:

- Process data only under documented instructions from the client.
- Maintain confidentiality of all personal data.
- Implement appropriate technical and organizational security measures.
- Assist clients in meeting legal and regulatory obligations.
- Notify clients of any confirmed personal data breach without undue delay.

Client Responsibilities

Clients remain responsible for:

- Obtaining lawful consent where required.
- Defining processing purposes.
- Ensuring lawful collection and disclosure of personal data.
- Providing processing instructions to AMLS.

5. Data Processing Principles

AMLS shall process personal data in accordance with the following principles:

- Lawfulness, fairness, and transparency.
- Purpose limitation.
- Data minimization.
- Accuracy and integrity.
- Storage limitation.
- Confidentiality and security.
- Accountability.

6. Confidentiality Obligations

All personnel handling personal data shall:

- Sign Confidentiality, NDA, and Code of Conduct agreements.
- Access data strictly on a need-to-know basis.
- Refrain from unauthorized disclosure, copying, or sharing of personal data.
- Maintain confidentiality during and after employment or engagement.

7. Security Measures

AMLS maintains reasonable security safeguards, including:

- Access controls and role-based permissions.
- Password protection and authentication controls.
- Encryption of data in transit where applicable.
- Endpoint and network security measures.
- Secure storage and restricted access to records.
- Regular monitoring and review of security controls.
- Employee awareness and privacy training.

8. Sub-Processors and Third Parties

AMLS may engage subcontractors or service providers only where necessary for service delivery.

The Company shall:

- Ensure equivalent data protection obligations are imposed on sub-processors.
- Execute written agreements requiring confidentiality and security controls.
- Remain responsible for oversight of approved sub-processors.

9. International Data Transfers

Where personal data is transferred outside India or across jurisdictions:

- Appropriate contractual safeguards shall be implemented.
- Equivalent protection standards shall be maintained.
- Transfers shall comply with applicable legal and regulatory requirements.

10. Standard Contractual Clauses (SCC-Like Commitments)

AMLS agrees to the following contractual commitments:

Processing Instructions

Personal data shall be processed only for authorized and documented purposes.

Confidentiality

All authorized personnel shall be bound by confidentiality obligations.

Security Measures

Appropriate technical and organizational measures shall be maintained to protect personal data against unauthorized access, disclosure, loss, alteration, or destruction.

Assistance

AMLS shall reasonably assist clients in responding to data subject requests and regulatory obligations.

Breach Notification

Any confirmed personal data breach affecting client data shall be reported without undue delay.

Audit Cooperation

Subject to reasonable notice and confidentiality obligations, AMLS may cooperate with client audit requests relating to data protection compliance.

Data Return or Deletion

Upon completion or termination of services, personal data shall be returned or securely deleted, unless retention is legally required.

11. Data Subject Rights

Where applicable, AMLS shall assist clients in handling requests relating to:

- Access to personal data.
- Correction of inaccurate data.
- Withdrawal of consent.
- Erasure of data.
- Grievance redressal.
- Other rights provided under applicable law.

12. Data Retention

Personal data shall be retained only for:

- Contractual requirements.
- Legal and regulatory obligations.
- Legitimate business purposes.

Data shall be securely deleted, anonymized, or archived when no longer required.

13. Incident and Breach Management

AMLS maintains procedures for:

- Detection and reporting of security incidents.
- Investigation of suspected breaches.
- Mitigation of risks and impacts.

- Documentation and corrective actions.
- Client notification where required.

14. Compliance Monitoring

The Company may periodically review:

- Data protection practices.
- Security controls.
- Vendor compliance.
- Employee adherence to privacy requirements.

Appropriate corrective actions may be implemented where necessary.

15. Policy Review

This Policy shall be reviewed periodically and may be updated to reflect changes in legal, regulatory, operational, or contractual requirements.

Contact Information

Anant Medicare & Legal Services Private Limited

Ujjain, Madhya Pradesh, India

Email: am.information@amlegalservices.org

Privacy & Compliance Contact: contact@amlegalservices.org

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Approved By: Management, Anant Medicare & Legal Services Private Limited