

PRIVACY POLICY

1. Objective

- 1.1** Pakona Engineers (I) Pvt. Ltd. (“Company”, “Pakona”, “We”, “Us” or “Our”) is committed to protecting the privacy of personal information provided by individuals who interact with the Company, including through our website(s), sales and service operations, and other digital or physical touchpoints (collectively, the “Platforms”). This Privacy Policy (“Policy”) describes how the Company collects, uses, discloses, and safeguards personal data in accordance with applicable privacy laws in India, including the Digital Personal Data Protection Act, 2023.
- 1.2** This Policy sets out the standards and practices followed by the Company to ensure that personal data is handled responsibly, securely, and transparently.
- 1.3** By using the Platforms or otherwise interacting with the Company (including placing an enquiry, purchase order, or service request), you agree to the terms of this Policy. If you do not agree, please discontinue use of our Platforms and services. For any queries, you may write to us at info@pakona.com.

2. Applicability

This Policy applies to all individuals who visit our Platforms, submit enquiries, place orders, engage us for installation or servicing of machinery, apply for employment, or otherwise interact with the Company — including customers, vendors, suppliers, contractors, job applicants, and website visitors.

3. Collection of Personal Data

- 3.1** We collect personal information that you voluntarily provide when you: (a) enquire about our packaging or precast concrete machinery and related products/services; (b) place a purchase order or request a quotation; (c) engage us for installation, commissioning, training, or after-sales service; or (d) otherwise contact us.
- 3.2** The categories of personal data we may collect include:
- 3.2.1. contact details, including name, designation, company name, work and mobile telephone numbers, and work/personal email and postal address;
 - 3.2.2. information provided by our vendors and suppliers in the ordinary course of business, including KYC and banking details for vendor empanelment and payments;
 - 3.2.3. professional details such as job title, employment history, and educational qualifications, particularly regarding recruitment and site engineers/technicians assigned to installation and service visits;
 - 3.2.4. identification documents (such as PAN, GST, passport, or other government-issued IDs) that may be required for export documentation, site access, or statutory compliance, which may incidentally reveal information such as nationality;
 - 3.2.5. information provided by our customers regarding authorised personnel, site contacts, and end-users of our machinery, in the ordinary course of business engagement; and

3.2.6. diversity and equal-opportunity information voluntarily shared by applicants during recruitment.

3.3 We do not process sensitive personal data or information (“SPDI”), such as passwords, financial/bank or credit card details, health records, or biometric data, except where explicitly authorised by law or by you, or where bank and medical details of employees are lawfully collected during recruitment and employment.

3.4 While providing information, you agree not to: (a) impersonate any other person; (b) suppress any material information; and (c) provide only information that is accurate and verifiable.

4. Ownership of Intellectual Property

4.1 All content on the Platforms, and all intellectual property associated with the Company’s business — including without limitation the “PAKONA” name and logo, associated brand marks, colour schemes and visual identity, product and model names, machine designs, technical drawings, engineering know-how, patents, copyrights, and photographs or videos of our machinery — are the exclusive property of Pakona Engineers (I) Pvt. Ltd. or its licensors, and are protected under applicable Indian and international intellectual property laws.

4.2 Nothing in this Policy, and no interaction with the Company or the Platforms, transfers any ownership of, or licence in, such intellectual property to you. No part of the Platforms, and none of our marks, colours, or machine designs, may be copied, reproduced, reverse-engineered, or otherwise used without our prior written consent.

5. Grounds for Processing Personal Data

5.1 We rely on the following lawful grounds to process personal data:

5.1.1. Consent — By providing personal information to us, you give free, specific, informed, and unambiguous consent to its use for the purposes identified in Section 6 below. You may withdraw or review your consent at any time by writing to info@pakona.com.

5.1.2. Legitimate Use — We may also process personal data: (a) for the specified purpose for which it was voluntarily provided, where you have not withdrawn consent; (b) to comply with applicable law requiring disclosure to government or regulatory authorities; (c) to comply with any judgment, decree, order, or legal claim; and (d) for purposes connected with employment or safeguarding the Company’s interests, including protection of trade secrets, technical drawings, and confidential engineering know-how.

6. Purpose of Collecting Personal Data

We collect and use personal data to:

- 6.1. provide, improve, and administer our packaging and precast concrete machinery, and related after-sales services;
- 6.2. process enquiries, quotations, purchase orders, and export documentation;
- 6.3. plan and coordinate installation, commissioning, training, and maintenance visits at customer sites;
- 6.4. communicate with customers, vendors, and other stakeholders;

- 6.5. ensure security, prevent fraud, and protect our premises, personnel, and intellectual property;
- 6.6. authenticate registered users on our website and process recruitment applications; and
- 6.7. comply with legal, regulatory, and contractual obligations, and for any other purpose with your consent.

7. Sharing Personal Data with Third Parties

7.1 We may share personal data with trusted third parties who are contractually bound to safeguard such data to at least the same standard we apply.

7.2 By consenting to this Policy, you also consent to sharing of your personal data with:

- 7.2.1. logistics, freight-forwarding, and customs agents engaged for delivery and export of machinery;
- 7.2.2. service partners, sub-contractors, and technicians engaged for installation, commissioning, and maintenance;
- 7.2.3. professional advisers, including auditors, insurers, and financial or legal advisors;
- 7.2.4. parties assisting with verification, anti-money-laundering checks, and resolution of client disputes;
- 7.2.5. law enforcement, government, or regulatory authorities, as required by applicable law;
- 7.2.6. payment processors, and marketing or recruitment service providers; and
- 7.2.7. parties involved in a merger, acquisition, financing, or transfer of the Company's business or assets.

8. Data Protection Rights

Subject to the Digital Personal Data Protection Act, 2023 and other applicable law, you have the right to:

- 8.1. Access — request confirmation of whether we process your personal data, and details of such processing, including third parties with whom it has been shared;
- 8.2. Correction, Completion, Updating and Erasure — request correction of inaccurate data, or erasure where you withdraw consent or the data is no longer needed; requests may be submitted to info@pakona.com;
- 8.3. Grievance Redressal — raise concerns with our Grievance/Data Protection Officer (see Section 14);
- 8.4. Nomination — nominate an individual to exercise your rights in the event of your death or incapacity;
- 8.5. Withdraw Consent — withdraw consent previously given, without affecting the lawfulness of processing carried out prior to withdrawal; the consequences of withdrawal are borne by you, and we may be unable to fulfil certain requests (e.g., processing an order) as a result.

9. Personal Data Security

We maintain reasonable technical, organisational, and physical safeguards to protect personal data, and restrict access to personnel who need it to perform their roles. However, no transmission over the internet is completely secure, and any transmission of data to us is at your own risk.

10. Timeline for Data Retention

We retain personal data only as long as necessary for the purposes described in this Policy, or as required by applicable law (e.g., tax, accounting, warranty, or export-compliance obligations), after which it is securely deleted or anonymised.

11. Do-Not-Track Feature

As there is currently no industry-wide standard for recognising “Do-Not-Track” browser signals, our Platforms do not respond to such signals at this time. We will update this Policy if a recognised standard is adopted.

12. Data Breach Notification

In the event of a data breach affecting your personal information, we will take reasonable steps to notify you and any affected individuals, contain and mitigate the impact, and notify regulatory authorities where required by applicable law.

13. Data Collection from Children and Persons with Disability

13.1 Our Platforms are business-to-business in nature and are not directed at, or intended for use by, children (persons under 18 years of age) or persons with disability who require assistance to provide consent. We do not knowingly collect or solicit personal data from such individuals.

13.2 It is our policy never to knowingly collect or retain personal data of anyone under 18 years of age, except where parental or legal-guardian consent forms the basis of processing.

13.3 By using our Platforms and providing information to us, you confirm that you are at least 18 years old, or that you are a parent/legal guardian consenting on behalf of a child or person with disability.

13.4 If we become aware that we have inadvertently collected personal data from a person under 18 years, we will take reasonable steps to promptly delete such data from our records.

13.5 If you believe we may have inadvertently collected such information, please contact us at info@pakona.com.

14. Grievance Redressal / Right to Lodge a Complaint

14.1 If you believe your personal data has not been processed in accordance with this Policy or applicable law, or if you have questions regarding your privacy rights, please contact our designated Grievance/Data Protection Officer:

Name: Mehul Vaidya

Email: mehul@pakona.com

Address: Yusuf Bldg, Office No. 217, 2nd Floor, Veer Nariman Road, Fort, Mumbai City, Mumbai, Maharashtra, India – 400001

14.2 The Grievance/Data Protection Officer shall apply best efforts to redress grievances within one (1) month of receipt, conduct periodic audits, and ensure compliance with the Digital Personal Data Protection Act, 2023 and other applicable provisions.

15. Changes to the Policy

We may modify this Policy at any time, at our sole discretion. The updated Policy will take effect once posted on the Platforms with a revised effective date. Where we make material changes, we will provide a prominent notice on the Platforms or a direct notification, as appropriate.

16. Contact Us

Email: info@pakona.com

Phone: +91-22-2285 4138 / 2282 6751 / 2204 8660

Address: Yusuf Bldg, Office No. 217, 2nd Floor, Veer Nariman Road, Fort, Mumbai City, Mumbai, Maharashtra, India – 400001

THE COMPANY VALUES YOUR TRUST AND IS COMMITTED TO PROTECTING YOUR PRIVACY. WE ENCOURAGE YOU TO REVIEW THIS POLICY PERIODICALLY.