



Government Access Request Policy:

The Government Access Request (“GAR”) policy describes how we will respond to requests from law enforcement agencies or government authorities (collectively, “Government Authority”).

Protection of Customer Information

Mastek is committed to protecting the privacy of personal data under its custody and control. We will not disclose our customers’ personal data to any Government Authority unless we are instructed by the customer to do so, or as described in this Policy.

If we do receive a court order such as for example, a valid warrant, subpoena or equivalent legal process by a Government Authority to disclose customer content relating to a particular customer, then we will take the following steps:

Notify the Customer: We shall promptly notify our customers of any request for disclosure by a Government Authority of customer content pursuant to valid legal process unless prohibited or otherwise restricted by law. In the absence of a valid warrant, subpoena, court order and equivalent legal process, then it is Mastek position and subject to our customer’s instructions not to provide customer content to the Government Authority.

Refer Government Agency to the Customer: We shall inform the relevant Government Authority, to the extent possible, that Mastek is a service provider and data processor acting on the customer’s behalf and all requests for access to customer content should be directed in writing to the contact person that the customer has identified to us. If the customer does not provide a contact, then we will re-direct the Government Authority to the customer’s legal department to handle government request for disclosure relating to customer’s content.

Limit Access: We will only provide access to customer content with customer authorization to do so. We will take reasonable steps to contest any required disclosure if we are requested to do so by our customer and in accordance with applicable law.

Safeguarding Customer’s Information

Mastek’s GAR policy is that the customer should have the opportunity to protect any personal information included in their customer content because the customer has the greatest interest in opposing, or is in the better position to comply with, a disclosure request.

Upon receipt of a GAR, Mastek shall notify the customer promptly unless restricted by law to do so, for example where there is an imminent risk of serious harm that exists and therefore prohibits prior notification. If Mastek is prohibited by law to notify the customer, then Mastek shall take the following steps below:

- a) **Scope of government disclosure request:** Mastek will seek to ensure that any request for customer information is limited to a clear and reasonable scope about a specific customer account and request additional information if the nature of the investigation is for example, vague, broad or voluminous and we will seek to challenge the nature of the disclosure request subject to customer’s approval. In the event Mastek does provide information, it will be the minimum amount of information required to comply with the demand and subject to customer’s approval to do so.
- b) **Evaluate Legal Validity:** We will review each government disclosure request for customer content and evaluate whether the request is legally valid and binding. We shall instruct legal

counsel, our legal team and our DPO to review and challenge the lawfulness of disclosure requests and take into account all applicable laws.

- c) **Challenge any unlawful request:** We shall instruct legal counsel, our legal team and DPO to challenge any requests for disclosure of customer content, if we reasonably believe the request does not comply with applicable law.
- d) **Require Legal Process to be followed:** We require governmental agencies to follow appropriate legal process under applicable laws.
- e) **Limit Scope of Disclosure:** Limit the scope of any disclosure to only the information we are required to disclose and only disclose the information in accordance with applicable law.

Regardless of where a government request comes from or who the customer is, Mastek is vigilant about protecting customer content. Mastek will not disclose customer content unless required by law to comply with a legally valid and binding obligation or order and the customer shall be promptly notified by us and authorize us to do so. Mastek reviews each request to determine that it complies with applicable laws.

How to submit a Government Access Request “GAR”

Please send us an email from an official government email address to data.protection@mastek.com and please include a copy of a court order, valid warrant, subpoena and any documentation in support which relates to a legally valid and binding request for disclosure of the customer’s personal data information so that we can assess the nature, context, scope, purpose and urgency of the request to notify and take instructions from the customer promptly about GAR.

Our legal team, DPO and Head of Legal receive all GAR requests through data.protection@mastek.com. However, this method of receiving a GAR is a convenient way to notify our customers. We do not accept receipt of a GAR by way of email as a valid method of service.

