CYBER SECURITY AND DATA PRIVACY POLICY

APOLLO MICRO SYSTEMS LIMITED ("the Company")

1. Purpose

The purpose of this Cyber Security and Data Privacy Policy is to safeguard the information assets of the Company, against unauthorized access, disclosure, alteration, and destruction. This policy aims to ensure the confidentiality, integrity, and availability of all information systems and data, while also ensuring compliance with legal, regulatory, and contractual obligations.

2. Scope

This policy applies to all employees, contractors, consultants, temporary staff, and other workers at the Company, as well as all third parties that access, process, or store the company's information. It covers all information systems, networks, applications, and data.

3. Policy Outline

The Company is committed to implementing and maintaining cyber security and data privacy measures to protect its information assets. This policy outlines the principles and practices that will be followed to prevent, detect, and respond to cyber threats and data breaches, ensuring that the company's operations and reputation are safeguarded.

4. Information Classification and Handling

All information and data shall be classified according to its sensitivity and criticality. The company will implement appropriate measures for the protection, handling, and storage of sensitive and classified information, ensuring that only authorized personnel have access to such data.

5. Data Protection and Privacy

The company will implement data protection measures, including encryption and access controls, to protect the privacy of all data, especially sensitive and classified information. The company will comply with applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR) and other relevant national and international standards, to ensure the lawful processing and protection of personal data.

6. Access Control

Access to information systems and data will be based on the principle of least privilege. Employees, contractors, and third parties will be granted access only to the

information necessary for their specific roles. Authentication methods will be employed to secure access to critical systems.

7. Risk Management

The company will adopt a risk-based approach to managing cyber security and data privacy risks. Regular risk assessments will be conducted to identify vulnerabilities and threats, and appropriate controls will be implemented to mitigate these risks to an acceptable level.

8. Employee Training and Awareness

The Company will conduct regular training and awareness programs for all employees and contractors to ensure they understand their responsibilities regarding cyber security and data privacy. Training will cover topics such as recognizing phishing attacks, secure data handling, and compliance with the company's policies.

9. Third-Party Security

All third parties with access to the company's information systems or data must adhere to the Comany's cyber security and data privacy standards. The company will ensure that third parties are subject to regular security assessments to verify compliance.

10. Monitoring and Auditing

Continuous monitoring of information systems and networks will be implemented to detect and respond to potential security threats in real-time. Regular audits and reviews of the company's cyber security and data privacy practices will be conducted to ensure ongoing compliance with this policy and to identify areas for improvement.

11. Compliance and Legal Requirements

The Company will ensure compliance with all applicable legal, regulatory, and contractual requirements related to cyber security and data privacy.

12. Policy Review

This policy will be reviewed as needed to reflect changes in the threat landscape, legal and regulatory requirements, or the company's operations.

13. Accountability

All employees, contractors, and third parties are required to comply with this policy. Non-compliance may result in disciplinary action, up to and including termination of employment or contracts.