

HALDIA PETROCHEMICALS LIMITED

1. Data Privacy Policy

1.1. Objective

The purpose of this policy is to maintain the privacy of and protect the personal information of employees, contractors, vendors, interns, associates, customers and business partners of Haldia Petrochemicals Limited and ensure compliance with laws and regulations applicable to Haldia Petrochemicals Limited (hereafter referred to as “HPL” or “the Organization”).

1.2. Scope

This policy is applicable to all HPL employees, contractors, vendors, interns, associates, customers and business partners who may receive personal information, have access to personal information collected or processed, or who provide information to the organization.

This Policy applies to all HPL employees, contractors, vendors, interns, associates, customers and business partners who receive personal information from HPL, who have access to personal information collected or processed by HPL, or who provide information to HPL, regardless of geographic location. All employees of HPL are expected to support the privacy policy and principles when they collect and / or handle personal information, or are involved in the process of maintaining or disposing of personal information. This policy provides the information to successfully meet the organization’s commitment towards data privacy.

All partner firms and any Third-Party working with or for HPL, and who have or may have access to personal information, will be expected to have read, understand and comply with this policy. No Third Party may access personal information held by the organization without having first entered into a confidentiality agreement.

1.3. Responsibilities

The owner for the Data Privacy Policy shall be the management of the Company. The Management shall be responsible for maintenance and accuracy of this policy. Any queries regarding the implementation of this Policy shall be directed to the Management

This policy shall be reviewed for updates by the Management on an annual basis. Additionally, the data privacy policy shall be updated in-line with any major changes within the organization’s operating environment or on recommendations provided by internal/ external auditors.

1.4. Policy Compliance

Compliance to the data privacy policy shall be reviewed on an annual basis by the Board of the Company to ensure continuous compliance monitoring through the implementation of compliance measurements and periodic review processes.

In cases where non-compliance is identified, the Board shall review the reasons for such non-compliance along with a plan for remediation and report them to Privacy Review Team. Depending on the conclusions of the review, need for a revision to the policy may be identified. In instances of persistent non-compliance by the individuals concerned, they shall be subject to action in accordance with the HPL Disciplinary Policy.

1.5. Data Privacy Principles

This Policy describes generally acceptable privacy principles (GAPP) for the protection and appropriate use of personal information at HPL. These principles shall govern the use, collection, disposal and transfer of personal information, except as specifically provided by this Policy or as required by applicable laws:

- **Notice:** HPL shall provide data subjects with notice about how it collects, uses, retains, and discloses personal information about them.
- **Rights of Data subject:** HPL shall provide individuals with the right to control their personal information, which includes the right to access, modify, erase, restrict, transmit, or object to certain uses of their information and for withdrawal of earlier given consent to the notice.
- **Collection:** HPL shall collect personal information from data subjects only for the purposes identified in the contract agreements and only to provide requested product or service.
- **Use, Retention and Disposal:** HPL shall only use personal information that has been collected for the purposes identified in the contract agreements and in accordance with the consent that the data subject shall provide. HPL shall not retain personal information longer than is necessary to fulfil the purposes for which it was collected and to maintain reasonable business records. HPL shall dispose the personal information once it has served its intended purpose or as specified by the data subject.

- **Access:** HPL shall allow data subjects to make inquiries regarding the personal information about them, that HPL shall hold and, when appropriate, shall provide access to their personal information for review, and/or update.
- **Disclosure to Third Parties:** HPL shall disclose personal information to Third Parties / partner firms only for purposes identified in the contract agreements. HPL shall disclose personal information in a secure manner, with assurances of protection by those parties, according to the contracts, laws and other segments, and, where needed, with consent of the data subject.
- **Security for Privacy:** HPL shall protect personal information from unauthorized access, data leakage and misuse.
- **Quality:** HPL shall take steps to ensure that personal information in its records is accurate and relevant to the purposes for which it was collected.
- **Monitoring and Enforcement:** HPL shall monitor compliance with its privacy policies, both internally and with Third Parties, and establish the processes to address inquiries, complaints and disputes.

1.6. **Notice**

Notice shall be made readily accessible and available to data subjects before or at the time of collection of personal information or otherwise, notice shall be provided as soon as practical thereafter.

Notice shall be displayed clearly and conspicuously and shall be provided through online and / or offline methods (e.g. through posts, couriers, etc.).

1.7. **Choice and consent**

Choice refers to the options the data subjects are offered regarding the collection and use of their personal information. Consent refers to their agreement to the collection and use, often expressed by the way in which they exercise a choice option.

1.8. **Collection of Personal Information**

Personal information may be collected online or offline. Regardless of the collection method, the same privacy protection shall apply to all personal information.

1.8.1. Personal information shall not be collected unless either of the following is fulfilled:

- 1.8.2. The data subject has provided a valid, informed and free consent;
- 1.8.3. Processing is necessary for the 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 prior to entering into a contract;
- 1.8.4. Processing is necessary for compliance with the organizations legal obligation;
 - 1.8.4.1. processing is necessary in order to protect the vital interests of the data subject; or
 - 1.8.4.2. processing is necessary for the performance of a task carried out in the public interest
- 1.8.5. Data subjects shall not be required to provide more personal information than is necessary for the provision of the product or service that data subject has requested or authorized. If any data not needed for providing a service or product is requested, such fields shall be clearly labelled as optional. Collection of personal information shall be avoided or limited when reasonably possible.
- 1.8.6. Personal information shall be de-identified when the purposes of data collection can be achieved without personally identifiable information, at reasonable cost.
- 1.8.7. When using vendors to collect personal information on the behalf of HPL, it shall ensure that the vendors comply with the privacy requirements of HPL as defined in this Policy.

1.9. Use, Retention and Disposal

Personal information may only be used for the purposes identified in the contract agreements and only if the data subject has given consent;

Such information shall be retained for as long as necessary for business purposes identified in the contract agreements at the time of collection or subsequently authorized by the data subjects.

- 1.9.1. When the use of personal information is no longer necessary for business purposes, a method shall be in place to ensure that the information is destroyed in a manner sufficient to prevent unauthorized access to that information or is de-identified in a manner sufficient to make the data non-personally identifiable.
- 1.9.2. HPL shall have a documented process to communicate changes in retention periods of personal information required by the business to the data subjects who are authorized to request those changes.

- 1.9.3. Personal information shall be erased if their storage violates any of the data protection rules or if knowledge of the data is no longer required by HPL or for the benefit of the data subject. Additionally, HPL has the right to retain the personnel information for legal and regulatory purpose and as per applicable data privacy laws.
- 1.9.4. HPL shall perform an internal audit on an annual basis to ensure that personal information collected is used, retained and disposed-off in compliance with the organization's dataprivacy policy.

1.10. Access

HPL shall establish a mechanism to enable and facilitate exercise of data subject's rights of access, blockage, erasure, opposition, rectification, and, where appropriate or required by applicable law, a system for giving notice of inappropriate exposure of personal information.

1.11. Disclosure to Third Parties

Data Subject shall be informed, if personal information shall be disclosed to Third Parties/ partner firms.

- 1.11.1. Personal information of data subjects may be disclosed to the Third Parties / partner firms only for reasons consistent with the purposes identified.
- 1.11.2. HPL shall notify the data subjects prior to disclosing personal information to Third Parties / partner firms for purposes not previously identified.
- 1.11.3. HPL shall communicate the privacy practices, procedures and the requirements for data privacy and protection to the Third Parties / partner firms.
- 1.11.4. The Third Parties shall sign a NDA (Non-Disclosure Agreement) with HPL before any personal information is disclosed to the Third Parties partner firms. The NDA shall include the terms on non-disclosure of customer information.

1.12. Security

Information security policy and procedures shall be documented and implemented to ensure reasonable security for personal information collected, stored, used, transferred and disposed by HPL.

- 1.12.1. Information asset labelling and handling guidelines shall include controls specific to the storage, retention and transfer of personal information.
- 1.12.2. Management shall establish procedures that maintain the logical and physical security of personal information.
- 1.12.3. Management shall establish procedures that ensure protection of personal information against accidental disclosure due to natural disasters and environmental

hazards.

1.12.4. Incident response protocols are established and maintained in order to deal with incidents concerning personal data or privacy practices.

1.13. Quality

HPL shall maintain data integrity and quality, as appropriate for the intended purpose of personal data collection and use and ensure data is reliable, accurate, complete and current.

1.14. Dispute Resolution and Recourse

HPL shall define and document an Incident and Breach Management policy which addresses the privacy related incidents and breaches.

- The incident and breach management program includes a clear escalation path up to the executive management, legal counsel, and the board based on type and/or severity of the privacy incident/breach. It shall define a process to register all the incidents/complaints and queries related to data privacy
- HPL shall perform a periodic review of all the complaints related to data privacy to ensure that all the complaints are resolved in a timely manner and resolutions are documented and communicated to the data subjects.
- An escalation process for unresolved complaints and disputes which shall be designed and documented.
- Communication of privacy incident / breach reporting channels and the escalation