



SARDA ENERGY & MINERALS LIMITED

Regd. Off: 73-A, Central Avenue, Nagpur (MH.) 440018
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URL: www.seml.co.in CIN: L27100MH1973PLC016617

Data Privacy and Protection Policy

1 Objectives of the Policy

Sarda Energy & Minerals Limited (SEML) is committed to protecting the privacy and confidentiality of personal and sensitive information. This policy explains how SEML collects, uses, stores, shares, and protects personal data responsibly and lawfully. The objective of this policy is to:

- i) Protect personal data from unauthorised access, misuse, loss, or disclosure
- ii) Ensure compliance with applicable data protection laws
- iii) Build trust with employees, customers, vendors, and other stakeholders
- iv) Promote a culture of data privacy and accountability across the organisation

2 Effective Date

This Policy comes into effect from 23.05.2026.

3 Scope and Applicability

This Policy applies to:

- i) All SEML employees (permanent, contractual, temporary)
- ii) Consultants, contractors, and interns
- iii) Third-party vendors and service providers dealing with SEML
- iv) Any individual who accesses or processes SEML data

It covers all forms of data, including:

- i) Electronic data (emails, systems, applications, databases)
- ii) Physical records (documents, files)
- iii) Data processed through SEML-owned or third-party systems

4 Applicable Laws and Regulations

SEML complies with all relevant data protection and information security laws, including but not limited to:

Indian Laws

- i) Digital Personal Data Protection (DPDP) Act, 2023
- ii) Information Technology Act, 2000
- iii) IT (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011

International Laws (where / when applicable)

- i) General Data Protection Regulation (GDPR - EU) for international stakeholders or operations
- ii) Other applicable local data protection laws based on geography and business requirements

5 Definitions

Personal Data: Any information that can identify an individual (e.g., name, contact details, ID numbers).

Sensitive Personal Data: Financial data, health records, biometric data, passwords, or any data



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classified as sensitive by law.

Data Subject: An individual whose personal data is processed by SEML.

6 Principles of Data Processing

SEML shall follow these core principles while handling personal data:

- i) Data is processed lawfully, fairly, and transparently
- ii) Data is collected only for specific and legitimate business purposes
- iii) Only necessary and relevant data is collected
- iv) Data is kept accurate and up to date
- v) Data is protected using appropriate security controls
- vi) Data is retained only for the required period

7 Data Collection and Use

- i) Personal data is collected only for clearly defined and lawful purposes
- ii) Data is used strictly for business, legal, or contractual requirements
- iii) Personal data is not used for any unauthorised or unrelated purpose
- iv) Consent is obtained wherever required by law

8 Data Storage and Retention

- i) Personal data is stored securely in authorized systems and locations
- ii) Appropriate technical and organizational safeguards are applied
- ii) Data is retained only as long as required for:
 - a) Business operations
 - b) Legal or regulatory compliance
- iv) Once no longer required, data is securely deleted, destroyed, or anonymized

9 SEML implements reasonable and robust security controls, including:

- i) Role-based access controls
- ii) Password protection and authentication mechanisms
- iii) Encryption of sensitive and critical data
- iv) Network security, firewalls, and monitoring systems
- v) Physical security for offices and record storage

Access to personal data is strictly limited to authorized personnel only.

10 Data Sharing and Third-Party Management

- i) Personal data is shared only when legally permitted or business-necessary
- ii) All third-party data sharing is governed by written agreements
- iii) Contracts include confidentiality and data protection clauses
- iv) Third parties must maintain security standards equivalent to SEML

11 Rights of Data Subjects

Subject to applicable laws, individuals have the right to:

- i) Access their personal data
- ii) Request correction or update of inaccurate data
- iii) Request deletion of data, where legally permissible

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- iv) Withdraw consent, where applicable
Requests will be handled in accordance with legal timelines and requirements.

12 Data Breach and Incident Management

In case of a data breach or suspected incident:

- i) Immediate actions will be taken to contain and control the impact
- ii) Incidents will be investigated promptly
- iii) Authorities and affected individuals will be notified as required by law
- iv) Corrective and preventive measures will be implemented

13 Roles and Responsibilities

- i) Employees & Users
 - a) Always follow this policy
 - b) Protect data accessed during work
 - c) Report suspected security incidents immediately
- ii) Management
 - a) Ensure proper implementation of this policy
 - b) Allocate resources for data protection and compliance
- iii) IT & Information Security Team
 - a) Implement and monitor security controls
 - b) Manage access, surveillance, and incident response
- iv) Third Parties
 - a) Comply with SEML's data protection requirements
 - b) Protect SEML data from unauthorized use or disclosure

14 Training and Awareness

SEML will conduct regular data privacy and information security training to:

- i) Educate employees on policy requirements
- ii) Promote secure data handling practices
- iii) Strengthen awareness of legal obligations and risks

15 Review

This Policy shall be reviewed periodically and updated as necessary to address changes in technology, emerging technologies, regulatory requirements and risk landscape.