

Data Privacy Policy

Adani Total Gas Limited

1 Introduction

Adani Total Gas Limited (ATGL) values the trust placed in it by its' employees, customers, associates, and partners and therefore, is committed to follow the highest standards of privacy guidelines to protect the information shared with ATGL.

This privacy policy describes the usage of personal information provided or collected by ATGL under during its' business operations.

2 Objectives

The objectives of this policy are:

- To ensure that all the personal information in ATGL's custody is adequately protected against threats to maintain its privacy and security.
- To ensure that ATGL employees are fully aware of the contractual, statutory, or regulatory implications of any privacy breaches.
- To limit the use of personal information to identified business purposes for which it is collected.
- To make all the stakeholders aware about, the processes that need to be followed for collection, lawful usage, disclosure/ transfer, retention, archival and disposal of personal information.
- To ensure that all third parties collecting, storing, and processing personal information on behalf of ATGL provide adequate data protection.
- To ensure that applicable regulations and contracts regarding the maintenance of privacy, protection and cross border transfer of personal information are complied

3 Scope & applicability

This policy is applicable to all ATGL employees, contractors, vendors, interns, customers, and business partners who may receive personal information from ATGL, have access to personal information collected or processed by or on behalf of ATGL, or who provide information to ATGL.

This policy covers the treatment of personal information gathered and used by ATGL for lawful business purposes. This policy also covers the personal information we share with authorized Third Parties or that Third Parties share with us.

4 Policy Statement:

ATGL shall follow generally acceptable privacy principles (GAPP) for the protection and appropriate use of personal information. 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:** ATGL shall provide data subjects with notice about how it collects, uses, retains, and discloses personal information about them.
- **Choice and Consent:** ATGL shall give data subjects the choices and obtain their consent regarding how it collects, uses, and discloses their personal information.
- **Rights of Data subject:** ATGL 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:** ATGL shall collect personal information from data subjects only for the purposes identified in the privacy notice / SoW / contract agreements and only to provide requested product or service.
- **Use, Retention and Disposal:** ATGL shall only use personal information that has been collected for the purposes identified in the privacy notice / SoW / contract agreements and in accordance with the consent that the data subject shall provide. ATGL shall not retain personal information longer than is necessary to fulfil the purposes for which it was collected and to maintain reasonable business records. ATGL shall dispose the personal information once it has served its intended purpose or as specified by the data subject.
- **Access:** ATGL shall allow data subjects to make inquiries regarding the personal information about them, that ATGL shall hold and, when appropriate, shall provide access to their personal information for review, and/or update.
- **Disclosure to Third Parties:** ATGL shall disclose personal information to Third Parties / partner firms only for purposes identified in the privacy notice / SoW / contract agreements. ATGL 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.
- **Obligations for Sub-processor:** Where a processor (vendor or 3rd party acting on behalf of ATGL's data processor) engages another processor (Sub-

processor) for carrying out specific processing activities on behalf of ATGL (controller), the same data protection obligations as set out in the contract or other legal act between ATGL, and the processor shall be imposed on the Sub-processor by way of a contract or other mechanism. Where the Sub-processor fails to fulfil its data protection obligations, the initial processor (relevant vendor or 3rd party acting on behalf of ATGL's data processor) shall remain fully liable to ATGL for the performance of that Sub-processor's obligations.

- **Security for Privacy:** ATGL shall protect personal information from unauthorized access, data leakage and misuse.
- **Quality:** ATGL 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:** ATGL shall monitor compliance with its privacy policies, both internally and with Third Parties, and establish the processes to address inquiries, complaints, and disputes.

5 Policy Compliance

- It is the responsibility of all employees to understand and adhere to the data privacy policy of the organization.
- All Business Heads/Department Heads shall be directly responsible for ensuring compliance with this policy in their respective business domains
- ATGL Management reserves all rights to take disciplinary action in case of its violation.

6 Review

This policy will be reviewed periodically to check for its effectiveness, changes in technology, and changes in Risk Levels that may have impact on privacy, legal & contractual requirements, and business efficiency.

7 Glossary

- **Data Subject:** Data subject refers to any individual person who can be identified, directly or indirectly, via an identifier such as a name, an ID number, location data, or via factors specific to the person's physical, physiological, genetic, mental, economic, cultural, or social identity. In other words, a data subject is an end user whose personal data can be collected.
- **Processing:** "Processing" or "Process" means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

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