



ATGL Data Privacy Policy

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1. Introduction

Adani Total Gas Limited ("ATGL") values the trust placed in it by its employees, customers, associates, and partners. ATGL is committed to ensuring the protection of personal information and upholding the highest standards of privacy and data security in accordance with applicable laws, including the Digital Personal Data Protection Act, 2023 (DPDP Act).

This policy outlines ATGL's approach to the collection, processing, storage, sharing, and protection of personal data, as part of its broader commitment to ethical conduct, transparency, and ESG principles.

2. Scope and Applicability

This policy is applicable to,

- All ATGL employees, contractors, vendors, partners, customers, and any other parties who may share, access, or process personal data on behalf of ATGL.
- All personal data collected, stored, processed, or transferred by ATGL in digital form in India or across borders.

3. Objectives

The objectives of this policy are:

- Establish ATGL's framework for responsible handling of personal data.
- Ensure compliance with applicable privacy and data protection laws.
- Provide individuals with clarity on how their personal data is collected, used, shared, and protected.
- Define the responsibilities of ATGL and its employees in safeguarding personal data.

4. Data Privacy Principles

ATGL shall process personal data in accordance with the following principles:

- **Lawful and Fair Processing:** Personal data shall be processed only for lawful purposes and in a fair, transparent manner consistent with the DPDP Act.

- **Purpose Limitation:** Data shall be collected and processed only for specific, legitimate business purposes and not used for purposes incompatible with the original intent.
- **Data Minimization:** ATGL shall collect only the minimum data necessary to achieve the intended purpose.
- **Accuracy:** ATGL shall take reasonable steps to ensure that personal data remains accurate, complete, and up to date.
- **Storage Limitation and Retention:** Personal data shall be retained only for as long as required to fulfil the stated purpose or as mandated by law. Once no longer needed, it will be securely deleted or anonymized.
- **Integrity and Confidentiality:** ATGL shall implement appropriate organizational, administrative, and technical safeguards to prevent unauthorized access, alteration, or loss of personal data.
- **Accountability:** ATGL shall document its privacy practices and ensure compliance through governance, audits and employee awareness programs.

5. Lawful Basis for Processing

ATGL may process personal data on one or more of the following lawful bases:

- Consent obtained from the Data Principal.
- Performance of a contract or business engagement.
- Compliance with legal or regulatory obligations.
- Protection of vital interests or legitimate business interests of ATGL.

6. Consent Management

- ATGL shall obtain free, specific, informed, and unambiguous consent from data principals before collecting or processing their personal data.
- Consent shall be accompanied by a clear notice specifying the purpose of data collection and the manner in which data will be processed.
- Individuals shall have the right to withdraw consent at any time, and ATGL shall provide an accessible mechanism to facilitate such withdrawal.

7. Rights of Data Principals

ATGL respects the rights of individuals as provided under the DPDP Act, including:

- Right to Access: Obtain confirmation of processing and a summary of personal data held.
- Right to Correction and Erasure: Request correction, completion, or deletion of inaccurate or outdated data.
- Right to Grievance Redressal: Seek resolution for any data-related complaint.
- Right to Nominate: Nominate another person to exercise rights in the event of death or incapacity.

Requests can be made through ATGL's Grievance Officer, as detailed in section 13 Grievance Redressal.

8. Disclosure and Third-Party Processing

- Personal data may be shared with vendors, partners, or service providers strictly on a need-to-know basis and under contractual obligations that ensure equivalent levels of data protection.
- Sub-processors engaged by vendors shall also be bound by similar obligations.
- ATGL shall not sell or disclose personal data to unrelated third parties without lawful basis or consent.

9. Cross-Border Transfer of Data

Where personal data is transferred outside India, ATGL shall ensure such transfers comply with the provisions of the DPDP Act and any guidelines or notifications issued by the Government of India, including ensuring equivalent data protection standards and safeguards.

10. Data Security and Protection

ATGL shall implement reasonable technical and organizational measures to:

- Protect personal data against unauthorized access, alteration, or disclosure.

- Ensure secure data storage, encryption, and transmission where applicable.
- Conduct periodic assessments and audits of privacy and security controls.
- Maintain incident management and breach response processes.

11. Data Breach Management

In the event of a personal data breach, ATGL shall:

- Take immediate steps to contain and investigate the incident.
- Notify the Data Protection Board of India and affected individuals, where applicable, as per the DPDP Act requirements.
- Document and review the incident to strengthen preventive measures.

12. Children's Data

ATGL shall not process personal data of children (under 18 years) without verifiable parental consent and shall ensure that such data is not used for tracking, behavioural monitoring, or targeted marketing.

13. Grievance Redressal

ATGL has designated a Grievance Officer to address concerns related to personal data processing, access requests, or privacy violations. Details of the Grievance Officer shall be made available on ATGL's official website and in relevant notices. All grievances shall be acknowledged and resolved in accordance with the timelines prescribed under the DPDP Act.

14. Governance, Training, and Compliance

- All employees, vendors, and contractors handling personal data shall be required to adhere to this policy and participate in periodic privacy awareness sessions.
- The Privacy Policy is integrated into the company-wide risk and compliance management framework to ensure consistent identification, assessment, and mitigation of privacy risks in alignment with applicable data protection regulations.
- Department Heads shall ensure compliance within their functions.

- ATGL shall engage independent third-party auditors to periodically assess compliance with this policy and applicable data protection regulations.
- Any breach of this policy will be subject to disciplinary action in accordance with the ATGL's zero-tolerance approach to non-compliance and ATGL management reserves all rights to take disciplinary action in case of its violation.

15. Commitment to Responsible Data Governance

ATGL views data privacy as a pillar of its Environmental, Social, and Governance (ESG) commitments. Protecting stakeholder data reflects ATGL's dedication to responsible business conduct, digital trust, and transparency.

16. Exceptions

Any exception shall be governed by the Adani Cyber Security Policy Exception Management Process.

17. Policy Non-Compliance

Non-compliance to the minimum requirements or violation shall result in the invocation of the Adani IT & Cyber Security Consequence Management Policy.

18. Review

This document shall be reviewed annually to check for its effectiveness, changes in technology, organization structure, legal & regulatory requirements and changes in risk levels that may impact Adani business environment. The effective date shall be as per the document approval date.

19. Terms & Definitions

Following terms and definitions are used in this process document:

- **Personal Data:** Any data about an individual who is identifiable by or in relation to such data.
- **Data Principal:** The individual to whom the personal data relates.
- **Data Fiduciary:** ATGL, when determining the purpose and means of processing personal data.

- **Data Processor:** Any third party or vendor that processes personal data on behalf of ATGL.
- **Processing:** Any operation performed on personal data, including collection, storage, use, sharing, disclosure, or deletion.

For Adani Total Gas Limited



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