



HINDUSTAN ZINC
Zinc & Silver of India

HINDUSTAN ZINC LIMITED

Employee Privacy Notice

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Document Change Control

Issue Date/ Review Date	Version	Change	Requested By	Approved By
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1. Purpose Of This Notice:

This privacy notice ("**Notice**") is provided by Hindustan Zinc Limited ("HZL", "we", or "us") regarding our collection of information about you ("**you**", "**your**" or "**employee**"), in accordance with our obligations under applicable data protection laws and regulations ("**Data Protection Laws**"). This Notice explains how we collect, use, process, disclose, and safeguard your personal information (defined below). We request you to review this Notice carefully. We recommend that you read this Notice carefully. By doing so, you consent to the use of your personal information as outlined herein.

2. Information We Collect:

We collect your personal information through any digital or physical records, including but not limited to:

- a) Name, home address, phone number, email address; nationality, photo, identification numbers, employee ID number, and, where permitted for diversity and monitoring purposes, information concerning your gender, blood type.
- b) Curriculum vitae (CV)/ resume, cover letter, employment history, education history, qualifications and skills, reference contact information, desired salary, interests and aspirations, and background screening information if relevant.
- c) Job title, compensation, benefits, bank details, professional experience, education, performance history, and about violation of laws or breach of company policies.
- d) Medical leave information, medical tests, other documents required to confer special benefit status, such as information concerning pregnancy status and age of children as per statute and your dependents' information.
- e) Information about your health and disabilities where we need to make any reasonable adjustments to meet the requirements promoting equality.
- f) Biometric information such as fingerprints and facial recognition for access to HZL premises and designated secure areas.

And any other information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you (collectively referred to as "personal information").

The categories of personal information we collect, and our use of personal information, may differ based on the specific position(s) or location, in addition to the relevant qualifications and responsibilities.

3. Applicable Legislation

This privacy notice is in accordance with the Digital Personal Information Protection Act 2023, herein referred to as the "DPDPA 2023 or DPDPA".

4. How We Use Your Information:

We may use, collect, store, process, and disclose the personal information in accordance with our legitimate business interest as an employer for the reasons outlined below:

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1. Where this is necessary for HZL to enter or administer your contract of employment or for services or in connection with services or benefits which you request from us.
 - To make informed decisions on employee credibility and assess the suitability for the role to which you have applied.
 - The administration of payroll and benefits, absences, compensation, gratuity, PF, leave encashment, and expense management.
 - To allow you to access medical insurance, occupational health, retirement plans, access to company travel, and childcare benefits, where provided.
2. Where necessary to comply with a legal obligation.
 - Making deductions from payroll for tax and providing information to tax authorities, as required by law.
 - Managing maternity pay (if applicable).
3. Where necessary for HZL's legitimate interests, as listed below, and where our interests are not overridden by your data protection rights.
 - To improve our onboarding process and activities.
 - To verify the details, you have supplied and conduct background checks both before your employment or engagement with us.
 - Managing and developing our personnel - for example, performance and talent management, training and leadership development, award recognition, employee surveys and Posh compliance of employees.
 - Arranging insurance.
 - Arranging professional travel/ Stay.
 - Protecting our legitimate business interests and legal rights. This includes, but is not limited to, use in connection with legal claims, compliance, regulatory, auditing, accounting, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements.
 - For the purposes of planning, due diligence, and implementation of commercial transactions (e.g., mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization, or other similar business transactions).
 - Managing the performance and security of our equipment, facilities, and electronic platforms. This includes administering access rights, monitoring compliance with information security and other company protocols, and were permitted by local law and in accordance with relevant policies, for investigations and disciplinary actions.
 - Publishing internal directories and providing other internal communications tools. This includes information which you provide for your internal company profile (including your photo).
 - To analyze and monitor the diversity of the workforce in accordance with applicable laws. This includes, for example, compliance with equal opportunity employment laws.
4. Where we rely on your consent to process certain personal data, you have the right to withdraw that consent. However, please note that in some cases, withdrawal of consent may be limited, particularly where the data is necessary for employment-related purposes or compliance with legal

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obligations. In such cases, revoking consent may affect our ability to continue your employment or provide certain services

Where we require the information to enter or continue managing an employment contract with you, or where we are required under applicable employment law, security law, or other laws applicable to us, the provision of information is mandatory. If you are an applicant and do not provide the relevant data, then we will not be able to make an offer of employment to you or we may be required to withdraw your offer of employment depending on the role you have applied for. If you are an existing employee and do not provide the relevant data, then we will not be able to fulfil some of our commitments to you. All other provision of your information is optional.

In the event of failing to provide any optional information (the information where the data principal is given an option to give consent) during your employment, there will not be any adverse impact on your employment, however we may not be able to fulfil some of your expectations.

5. For all employees, it will be necessary for us to verify the details you have supplied (for example, in relation to your identity, employment history, academic qualification and professional credentials) and to conduct background checks both before and during your employment (for example, in relation to previous criminal convictions or financial standing). Background checks will typically be conducted at as late a stage as is practicable in the recruitment process and often only after you have been selected for the position. If your application is successful, we will provide further information about the checks involved and will obtain any necessary consent prior to completing such checks.

5. Who We Share Your Information With

We may share your personal information with the following categories of recipients, for the purposes outlined in this notice:

Internal Teams:

- a) Human Resource to manage employment-related matters such as benefits, performance, and payroll.
- b) To provide system access and support, ensure cybersecurity, and monitor compliance with IT policies.
- c) To facilitate performance reviews, training, and decision-making regarding promotions or disciplinary actions.

External Service Providers:

- a) Payroll Providers: To process salary payments, taxes, and benefits.
- b) Health and Safety Providers: To manage medical assessments and work-related health services.
- c) Insurance Providers: To handle claims related to health, disability, or life insurance.
- d) External IT Vendors: To manage and support company IT systems, networks, and software.

Regulatory and Legal Authorities:

- a) Government Agencies: To comply with legal obligations, such as tax authorities or labour inspectors.
- b) Legal Advisors and Courts: If required for legal claims, disputes, investigations or litigation.

Third-Party Business Partners:

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We may share your information with third-party partners in connection with business transactions, mergers, acquisitions, or joint ventures. These partners will be bound by privacy agreements to protect your data.

6. Retention Period and Storage:

We retain your personal data for no longer than is necessary to fulfil the purposes outlined in this Privacy Notice and to comply with our legal, regulatory, and contractual obligations. The specific retention periods for different types of data are determined based on the following factors:

- Legal requirements: Some data may need to be kept for a minimum period due to legal obligations (e.g., payroll records, tax records etc.).
- Contractual obligations: Data related to your employment may be kept for the duration of your employment and a period afterward, depending on company policies and legal requirements.
- Operational requirements: Data necessary for performance management, training, and development may be retained for as long as relevant for your professional development.

Once the data is no longer needed for the stated purposes, it will be securely deleted, anonymized, or destroyed.

7. Exercise of Rights:

You have the right to ask HZL for a copy of your personal data, to correct, update, or withdraw your consent for that specific processing at any time of your personal data. However, in case it conflicts with the processing of your details for essential activities such as payroll or with the requirements of any applicable law, we may not be able to process the request.

In addition, you have the right to grievance redressal where you can register any grievance with HZL, you have the right to nominate any other individual to exercise the above-mentioned rights in the event of death or incapacity. Where we have asked for your consent, you may withdraw consent at any time. If you ask to withdraw your consent to HZL processing your data, this will not affect any processing which has already taken place at that time.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. If you have unresolved concerns, you have the right to raise query to Data Governance and Privacy Officer (DGPO).

8. Changes to this notice:

HZL shall review and monitor from time to time the implementation of this Notice to ensure its effectiveness and may also recommend changes, if any, to the Human Resource for ensuring effective employee privacy. The policy is reviewed when there is a change or annually.

9. Contact Us:

If you have any questions or require further clarification regarding the Privacy Notice for Employees or our Privacy Policy or to exercise your rights, please do not hesitate to contact us: HZLDPO@Vedanta.co.in

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