



HINDUSTAN ZINC
Zinc & Silver of India

HINDUSTAN ZINC LIMITED

Consent Policy

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Contents

1. Scope	4
2. Policy Objectives	4
3. Applicable Legislations	4
4. Definitions and List of Abbreviations	4
5. Responsibilities	6
6. Policy Statements	6
7. Guidelines	8
7.1. Consent Records	8
7.2. Consent Renewal	8
7.3. Consent Withdrawal	8
8. Enforcement	9
9. Policy Review	9
10. Associated Documents	9
11. Annexure A: Consent Statement	9
12. Annexure B: Consent Withdrawal Statement	11

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1. Scope

This policy outlines the procedures for HZL to guarantee that consent is obtained at all points of personal information collection, including applications and direct interactions with data principals, whether conducted digitally or in person. This encompasses any customer, employee, third-party employee, or service provider. The document seeks to create a transparent process for acquiring informed, explicit, and valid consent, as well as for withdrawing consent when applicable, all while upholding individual rights and ensuring clarity in personal data processing activities.

2. Policy Objectives

The purpose of the policy is to ensure that:

- Consent is collected and recorded at all personal information collecting applications, systems in HZL's environment;
- An affirmative, clear, non-bundled and easy to withdraw consent is collected;
- Consent is obtained from legal guardians or parents when handling special types of personal data, like personal data about individuals with disabilities and personal data related to children under 18 years old.
- Any consent that is collected in physical format, which later is converted and stored in a digital form will come under the purview of DPDPA.

3. Applicable Legislations

Digital Personal Data Protection Act 2023

"Applicable Legislations" refers to the Digital Personal Data Protection Act 2023, herein referred to as the "DPDPA 2023 or DPDPA. This consent management policy is aligned with the Digital Personal Data Protection Act 2023 (DPDPA 2023).

4. Definitions and List of Abbreviations

Note: For the purposes of this and related policies, the terms Data Fiduciary, Data Processor and Data Principal under the Digital Personal Data Protection Act (DPDPA) will be used interchangeably with the terms Data Controller/ PII Controller, PII Processor and Data Subject/ PII Principal as defined in Privacy Information Management System (PIMS) standard. Both sets of terms refer to equivalent roles and responsibilities in personal data management and protection. This alignment applies to all related references within this and other organizational policies.

Term	Definition
Choice	Choice refers to the idea that consent must be freely given and that data subjects must have a genuine choice as to whether to provide personal data or not. If there is no true choice it is unlikely the consent will be deemed valid
Consent	Any freely given, specific, informed and unambiguous indication of the PII Principal's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

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Framework	Sets an overall approach to managing certain areas of the business. They help outline guiding principles and key standards to influence decision making in line with the organization's strategy and objectives.
Guidelines	Guidelines are recommendations to enable employees to perform their general responsibilities or specific tasks effectively. Conformance is expected unless, when applying professional judgement, circumstances justify deviation
Lawful Basis	PII can be collected or processed if it has a lawful basis. Some legal basis for processing can be consent, necessity, contract requirement, legal obligation, protection of data subject, public interest, or legitimate interest of the controller.
Personal Data	Data about or relating to a natural person who is directly or indirectly identifiable, having regard to any characteristic, trait, attribute, or any other feature of the identity of such natural person, whether online or offline, or any combination of such features with any other information, and shall include any inference drawn from such data for the purpose of profiling. For e.g., name, health data, identification data (Aadhar, PAN, Passport), sexual orientation, financial data (bank account, cheque book etc.), biometric data, genetic data.
Data Fiduciary	Any person, including the State, a company, any juristic entity, or any individual who alone or in conjunction with others determines the purpose and means of processing of personal data.
Data Principal	Means the individual to whom the personal data relates and where such individual is: <ol style="list-style-type: none"> i. a child, includes the parents or lawful guardian of such a child. ii. a person with disability, includes her lawful guardian, acting on her behalf
Data Processor	Any person, including the State, a company, any juristic entity or any individual, who processes personal data on behalf of a data controller/ fiduciary.
Processing	Any activity in relation to personal data, means an operation or set of operations performed on personal data, and may include operations such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, use, alignment, or combination, indexing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.
Consent Manager	A person registered with the Board, who acts as a single point of contact to enable a Data Principal to give, manage, review and withdraw her consent through an accessible, transparent and interoperable platform.
Regulations	Regulations, legislations and standards that govern the conduct and management of company. References to regulations should be reviewed regularly to ensure they are correct and accurately reflect company regulatory obligations.
Departmental representatives	designated individuals within specific departments who are responsible for ensuring that data privacy regulations and policies are adhered to within their respective areas. They act as intermediaries between their department and the organization's Data Governance & Protection Officer (DGPO) or privacy team, ensuring that data processing activities comply with privacy laws
Transparency	Transparency is about being clear, open and honest with your users about what they can expect when they share their personal information with HZL

- CIO – Chief Information Officer
- DGPO – Data Governance & Privacy Officer
- HoD- Head of Department
- HZL – Hindustan Zinc Limited

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- SLA – Service Level Agreement
- CISO- Chief Information Security Officer

5. Responsibilities

DGPO is responsible to ensure awareness regarding transparency and is responsible for ensuring that transparency Principle is adhered to throughout the personal information Lifecycle.

All HoDs and Departmental representatives are responsible for ensuring that this policy is implemented throughout the personal information Lifecycle.

The CISO is responsible for approval of Privacy Notices, transparency during communications for Breach etc.

6. Policy Statements

Conditions in which consent is required:

- Where HZL offers individuals real choice and control over how it uses the data of Data Principals. If choice is given to Data Principals before processing the data and if the Data Principals can withdraw the consent, it can be the legal basis for processing.
- Following questions to be asked before considering consent as a legal basis:
 - Would HZL still process the data under a different legal basis, even if consent is refused or withdrawn
 - consent can be refused or withdrawn without detriment to the Data Principals;
 - Is HZL in a position of power over the Data Principals; or,
 - Where a processing activity is necessary for the performance of a contract.
- If personal data is used HZL may need to seek explicit consent to legitimize the processing in all thecases.
- Consent will be required for marketing calls and marketing messages to PII Principal/ Data Principals. Consent will be required to place Website cookies or other online tracking methods, or to install apps or other software on people's devices.
- If HZL is processing personal data of a Data Principals, then explicit consent must be taken for processing the personal data except in specific cases. For instance, when processing health-related personal data of workers under legitimate business interests, consent is not required, as the fitness of workers is essential for job performance.
- Consent has to be asked for a specific purpose and not bundled, freely given by the person from whom consent is sought and unambiguous language should be used for taking consent. Therefore, it is important to ensure that consent requests are kept separate from other terms and conditions, that technical and legal jargon is avoided, that the request is prominent and clearly visible to the Data Principals, and is user-friendly (i.e., not unnecessarily disruptive).
- Children's / person with disability's consent to processing their personal data:
 - Parental / lawful guardian consent shall be collected in the case of processing personal data of children under 18 years and of a person with a disability. HZL shall implement the following three processes to ensure consent obtained is valid:
 - i. Age verification mechanisms of children upon the collection of personal data;

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- ii. Consent to be collected from individuals holding the parental / lawful guardian responsibility of children / person with disability; and
 - iii. Verification of parental / guardian responsibility. For e.g documents such as government id's, court document in case of adoption such as custody agreement or adoption papers etc.
- In this regard HZL provides that:
 - A clear privacy notice is served wherever personal data is collected (Privacy Notice) to ensure that consent is informed and that the Data Principals is informed of their rights in relation to their personal data.
- The notice shall provide the following information:
 - The Data Fiduciary's identity – i.e. a statement that HZL is a Fiduciary;
 - The purpose of each processing operations for which consent is sought;
 - The types of personal data that will be collected and used;
 - The existence of the right to withdraw consent;
 - Information about the use of the personal data for decisions based solely on automated processing, including profiling, and,
 - If data is transferred to third parties or third countries.
- The information should be conveyed in a manner that remains clear, concise and not unnecessarily disruptive, the use of layered and just-in-time notices should be favoured. However, it is important to note that the initial layer contain all of the key information needed for there to be an informed choice.
- HZL provides medical care benefits including medication, hospitalization for employees and their dependents, including children. In order to provide such benefits, health-related data will be collected by HZL and shared with the staff at the hospital and any other medical institution with which HZL has a tie up. This data provided will not be used for any purpose other than the provision of healthcare services. By availing this service, it is presumed that employees have consented to the processing of the personal data.
- HZL collects data relating to religion and caste to fulfil its lawful requirements for diversity and equal opportunity employer. This data is also provided to governmental authorities.
- HZL demonstrates Data Principal(s) consent to the processing of his or her personal data for one or more specific purposes
- HZL demonstrates Data Principal(s) consent is clearly distinguishable from any other matter relating to the Data Principal.
- HZL demonstrates Data Principal(s) consent is intelligible and accessible using clear and plain language.
- HZL demonstrates Data Principal(s) are informed of their right to withdraw consent before giving consent
- HZL demonstrates processing of data is limited to that stated in the contract, bound by the explicit consent given by the Data Principals.

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7. Guidelines

7.1. Consent Records

Record of the consent shall be maintained. It shall provide the following details:

- The name or other identifier of the data principal that consented;
- The dated document, a timestamp, or note of when an oral consent was made;
- The version of the consent request and privacy policy existing at the time of the consent; and,
- The document or data capture form by which the data principal submitted his or her data;
- The existing status of consent, whether the consent is active, withdrawn or shared for renewal
- The records shall be implemented either as audit trails, logs, excel tracker, timestamps of consent collected, soft copy of signed form, email, or over corporate website as per the technical feasibility of HZL.

7.2. Consent Renewal

- HZL shall ensure that consent collected from data principals shall be refreshed and grant data principals with the provision to control their consent preferences in case any one of the following applies:
 - i. Expansion in scope of processing of personal data and there exists no correlation between the identified purpose of collection and the intended purpose of processing.
 - ii. Change in the retention period of personal data specific to data principal and subsequent changes to the exercise of “Right to nominate” by the data principal; and
 - iii. Change in nature of processing of personal data such as disclosure of personal data to additional third-parties, service providers, vendors for HZL or its group entity.
- Please note, Such Consent renewal can be taken via email confirmations from the data principals.

7.3. Consent Withdrawal

Upon receiving a withdrawal of consent request from a data principal, the following steps are to be followed:

- (i) Verify or authenticate the identity of the data principal;
- (ii) Validate the received request with respect to the correctness and applicability of the request;
- (iii) Assess the withdrawal of consent request and determine from which data processing activity/workflow consent is to be withdrawn;
- (iv) In case, the processing of personal data is lawful under other basis such as to meet contractual obligations, legitimate interests pursued by HZL, regulatory requirements or processing carried out under the authority of relevant government bodies or processing to protect vital interests of data principals, then the request to withdraw consent shall stand null and void and can be rejected;
- (v) Once the request is acknowledged and no conflicts exist, the processing of personal data for the data principal shall cease.
- (vi) The data principal shall be notified about successful completion of the request.

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- In a subscription situation where Data Principal has withdrawn consent to the processing of his or her personal data as recorded in the Consent Withdrawal Form.
- All introductory mails to carry an unsubscribe link
- The contact details of those who have asked not to be contacted (unsubscribe) shall be removed from all mailing lists
- All employees shall be educated to ensure no mails are sent to those who have unsubscribed.
- Where the processing had multiple purposes, HZL demonstrates withdrawal of consent for each purpose as recorded in the Consent Statement
- The processing activities that relied upon the consent is stopped in accordance with the relevant process. The relevant data owner shall inform the Data Governance & Privacy Officer of such change.

8. Enforcement

Any employee or Third party found to have violated this policy may be subject to revocation of access and disciplinary action.

9. Policy Review

The DGPO shall review and update this policy annually or change in Regulation or change in processing activity. Any changes to this procedure, will be notified to you (HZL employees, Business partners) by other means such as email etc.

10. Associated Documents

- PIMS Consent Record
- PII Obligation Policy
- Data Privacy Policy

11. Annexure A: Consent Procedure

1. Purpose

The purpose of this procedure is to establish a proper and systematic approach to obtain, manage, and document consent for the collection, processing, storage, and use of personal data in compliance with applicable data protection laws such as the DPDPA (Digital Personal Data Protection Act).

2. Scope

This procedure applies to all departments, employees, and third parties handling personal data collected by HZL.

3. Consent collecting procedure

Once, HZL business owners assess and identify that consent shall form the lawful basis of processing personal data, consent shall be collected at all interactions and information collection systems for the following scenarios:

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a) Processing of personal data elements

HZL shall ensure that consent shall be collected and recorded in case processing involves personal data elements of data principal.

A valid consent shall be collected for applications and information collection systems through the use of window or notification requiring the data principals to affirmatively “check-in” or “tick” or provide digital signature confirming that they understand and agree to the processing of their personal information. Consent shall also be obtained for using or placing web cookies on an individual’s computer or other electronic devices on websites hosted by HZL.

If required, a written consent with signature from data principal shall be required based on the information processing activity and technical feasibility.

b) Explicit consent

Consent shall be obtained and recorded in all of the following scenarios to ensure consent forms a lawful basis of processing:

- Processing of special categories of personal data

Special categories of personal data include information revealing racial or ethnic origin, religious beliefs, sexual orientation, biometric data or philosophical beliefs among others.

The consent statement shall explicitly highlight the collection and processing of special categories of personal data and require the data subject/ principal to actively opt-in.

- Processing involving automated decision making or profiling

HZL shall obtain explicit consent of data principals prior to initiating a processing activity which produces decisions based on automated decision making or profiling.

HZL shall mention the scope of automated decision making and the outcome to data principals.

HZL shall incorporate necessary technical safeguards to introduce intervention and feasibility to contest decisions on the request of the data principals.

- Children’s consent to processing their personal data

Consent shall be collected in case processing of personal data of children below the age of 18 years is performed by HZL. HZL shall implement the following two processes to ensure consent obtained is valid:

- (i) Age verification mechanisms of children upon the collection of personal data;
- (ii) Consent to be collected from individuals holding the parental responsibility of children; and
- (iii) Verification of parental responsibility.

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- Overseas transfer of data principals personal data outside of the country of residence

The data protection controls and safeguards to be considered at minimum shall include, but not limited to:

- (i) Necessary physical security and access control mechanisms;
- (ii) Feasibility of implementing encryption on storage locations;
- (iii) Network segregation and regular checks;
- (iv) Periodic privacy or information security risk assessments and reviews of data protection controls;
- (v) Status of compliance with local laws and regulations specific to data protection and privacy, if any.

In case of absence of necessary safeguards and data protection controls for transfers of personal data to the destination country, HZL shall obtain and record consent explicitly mentioning about the transfers of personal data to ensure lawful basis can be demonstrated by HZL.

- Virtual Job Interview Process

HZL shall obtain explicit consent of candidates prior initiating a video snapshot during job interview process as a counter to interview forgery malice. (The snapshot is taken as a mandate under the established process).

HZL shall incorporate necessary technical safeguards to introduce intervention and feasibility to contest decisions on the request of the data principals.

- I. Identity verification mechanisms of candidates upon the collection of personal data;
- II. Consent to be collected from individuals; and
- III. Feasibility of implementing encryption on storage locations;
- IV. Periodic privacy or information security risk assessments and reviews of data protection controls;
- V. Status of compliance with local laws and regulations specific to data protection and privacy, if any

12. Annexure B: Consent Withdrawal Statement

I withdraw my consent to process my personal information from HZL. HZL no longer has my consent to process my personal information for the purpose of [specify legitimate reason of processing personal data], which was previously granted.

Signed by Data Principal:

Date:

Request actioned:

Data Governance & Privacy Officer

HZLDPO@Vedanta.co.in

Date:

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