



**DATA PRIVACY POLICY**

**OF**

**LLOYDS METALS AND ENERGY LIMITED**

**(CIN: L40300MH1977PLC019594)**

**Registered Office:** Plot No. A 1-2, MIDC Area, Ghugus,  
Chandrapur, Maharashtra - 442505  
**Tel. Nos.:** 07172 285103 / 285398

**Corporate Office:** A-2, 2nd Floor, Madhu Estate,  
Pandurang Budhkar Marg, Lower Parel, Mumbai 400 013  
**Tel. Nos.:** 022 6291 8111

**This Policy is effective from 16<sup>th</sup> March, 2023**

**1. Objective:**

The purpose of this policy is to maintain the privacy of and protect the personal information of employees, contractors, vendors, interns, associates, customers and business partners of Lloyds Metals and Energy Limited (“the Company” / “LMEL”) and ensure compliance with applicable laws and regulations.

**2. Scope:**

The scope of this policy is applicable to all the locations of LMEL.

All LMEL employees, independent contractors, vendors, interns, associates, clients, and business partners who might be in possession of personal information, who have access to personal information that has been gathered or processed, or who give information to the company are subject to the terms of this policy. When they gather, handle, or are part in the process of retaining or discarding personal information, all LMEL personnel are obligated to uphold the privacy policy and principles. This policy provides the information to successfully meet the organization’s commitment towards data privacy.

This policy must have been read, understood, and followed by all partner companies and any third-party working with or for LMEL who has access to or may have access to personal information. Without initially signing a confidentiality agreement, no third party is permitted to access any personal information that the organization holds.

**3. Policy Compliance:**

In order to maintain ongoing compliance monitoring through the adoption of compliance measurements and periodic review processes, The IT team will annually assess compliance with the data privacy policy.

When non-compliance is found, IT head must assess the circumstances and provide a plan for correction. Depending on the results of the evaluation, the policy may need to be modified. Individuals who exhibit repeated non-compliance will be subjected to disciplinary action.

<b>Prepared By</b>	<b>Reviewed By</b>	<b>Approved By</b>
Ms. Trushali Shah	Mr. Prashant Puri	Mr. Madhur Gupta

**4. Data Privacy Principles:**

- i. **Choice and Consent:** LMEL shall give data subjects the choices and obtain their consent regarding how it collects, uses, and discloses their personal information.
- ii. **Rights of Data subject:** LMEL 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.
- iii. **Collection:** LMEL shall collect personal information from data subjects only to provide requested product or service.
- iv. **Use, Retention and Disposal:** LMEL shall dispose the personal information once it has served its intended purpose or as specified by the data subject.
- v. **Access:** LMEL shall allow data subjects to make inquiries regarding the personal information about them, that LMEL shall hold and, when appropriate, shall provide access to their personal information for review, and/or update.
- vi. **Security for Privacy:** LMEL shall protect personal information from unauthorized access, data leakage and misuse.
- vii. **Quality:** LMEL shall take steps to ensure that personal information in its records is accurate and relevant to the purposes for which it was collected.

**5. Access:**

- i. Data subjects shall be entitled to obtain the details about their own personal information upon a request made and set forth in writing. LMEL shall provide its response to a request within 96 hours of receipt of written request.
- ii. The data subjects shall have the right to require LMEL to correct or supplement erroneous, misleading, outdated, or incomplete personal information.

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- iii. Requests for access to or rectification of personal information shall be directed at the data subject's option, to the manager of the projects team or support function responsible for the personal information.
- iv. The privacy coordinators shall record and document each access request as it is received, and the corresponding action taken.
- v. LMEL shall provide personal information to the data subjects in a plain simple format which is understandable (not in any code format).

**6. Quality**

LMEL shall maintain data integrity and quality, as appropriate for the intended purpose of personal data collection and use and ensure data is reliable, accurate, complete, and current.

- i. For this purpose, the IT head shall have systems and procedures in place to ensure that personal information collected is accurate and complete for the business purposes for which it is to be used.
- ii. LMEL shall perform an annual assessment of the personal information collected to check for accuracy, completeness, and relevance of the personal information.

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