

Data Protection & Privacy Policy

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Authorized Signatory

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Date: 30-09-2025

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1. Introduction

This document shall describe JSW Group's (JSW Group hereby refers to JSW Steel Limited, JSW Energy Limited, JSW Infrastructure Limited, JSW Cement Limited, JSW Paints Limited, and other Group companies and subsidiaries, hereinafter also referred to as "the Organization") methodology for defining, establishing, and maintaining the documents related to the ISO/IEC 27001:2022 Information Security Management System (ISMS).

2. Purpose

This internal policy is intended to provide uniform privacy and data protection principles and requirements to be applied across JSW Group business operations where PII processing is involved.

Following this policy will help JSW Group meet its privacy and data protection responsibilities and commitments made to employees, consumers, business partners who have entrusted JSW Group with their PII, as well as support compliance with applicable regulations.

3. Scope

This Data Protection and Privacy Policy is applicable to businesses and support processes at JSW Group that may perform any set of data processing operations on JSW Group information. This includes, collection, use, storage, disclosure, sharing, transfer, and/or disposal of information. The principles and related requirements outlined in this policy must be considered and, where applicable, applied for processing of any information.

4. Exception

Approval for exceptions or deviations from this policy and other relevant process, wherever warranted, shall be provided only after an appropriate assessment of the compensatory controls and risks arising out of providing such exceptions.

Any exception to this document shall be addressed to and approved by the Head of IT Security Department (ITSD), ITSD Head may delegate the approval authority for any similar or subsequent exceptions / deviations to IT Security Manager.

Exceptions shall not be universal but shall be agreed on a case-by-case basis, upon official request. All exceptions / deviations, when approved, shall be for a minimum period and shall not exceed a year/month in any case. Any extension request shall be reviewed and assessed again by the approver before the expiry of the approved period.

5. Review Frequency

This document shall be reviewed annually or in response to significant changes in the existing organizational structure or technical infrastructure. Any processes that are identified to be redundant during the review shall be withdrawn. The updated process shall be published on the Intranet after the review and notified to all JSW Group users through appropriate channels.

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6. Policy

This policy shall provide directions for protecting information and to implement controls as required to protect personal information.

6.1. Protection of Personal Information

- The protection and privacy of JSW Group customers, employees, contractors, or other third-party personal information, shall be ensured in accordance with the relevant legislations, regulations and contractual clauses.
- It is not permitted to process personal data for purposes other than those approved by the organization.
- Appropriate technical and procedural security controls shall be implemented to safeguard the confidentiality and privacy of personal information. These controls will prevent unauthorized access and/ or improper use of such information.
- The controls implemented to protect the confidentiality and privacy of personal information, shall be subject to continuous enhancement as new technologies becomes available.
- JSW Group shall identify and ensure it has visibility of all personal information within the organization.
- JSW Group shall share any personal information with third party vendors and cloud service providers as per the guidelines established by the organization.
- JSW Group shall develop comprehensive privacy framework defined in alignment to various data privacy requirements across the globe, as applicable to JSW and its Group companies.
- Personal information shared voluntarily by customers and/ or visitors to order a JSW Group service, shall receive the same level of protection regardless of the way used to order such service.
- JSW Group shall perform an annual assessment on the personal information collected to check for accuracy, completeness and relevance of the personal information.
- JSW Group shall conduct an internal audit annually and the internal audit shall consist of the review of the following:
 - personal information collected from data principal
 - The purposes of personal information collection and processing
 - The actual use of the personal information

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- Disclosures made about the purposes of the collection and use of such data
- Any legal obligations regarding the collection and processing of such data
- Data protection mechanisms such as data masking and data loss prevention shall be implemented where necessary in accordance with JSW Group's business requirements, local regulatory requirement, and in line with the 'Asset Management Procedure'.

6.2. Use of personal information

- Any personal information or sensitive personal data or information (SPDI) shall be identified and classified as per the schema defined in the 'Asset Management Procedure'.
- Personal information or SPDI (if any) shall only be collected and used for business purposes, and in line with relevant legislations, regulations and contractual clauses.
- Personal information shall not be shared without due consent of the concerned individual, except where JSW Group may be obligated to share such information with law-enforcement, government and regulatory authorities, or to prevent imminent loss or harm to the concerned individual or others.
- When the use of personal information is no longer necessary for business purposes, the data shall be securely destroyed.
- Employee/ customer personal information may be used to investigate and help prevent potentially unlawful activity or activity that threatens other employees/ customers.
- Communications that may include personal information such as email, and phone calls, made through JSW Group systems and networks, will only be recorded and monitored in accordance with defined instructions, and approvals.
- Data principals shall be entitled to obtain the details about their own personal information upon a request made and set forth in writing.
- If transfer of data is required, JSW Group shall inform the concerned parties about the possible risks of such transfers for the party concerned and obtain consent to the proposed transfer.
- JSW Group shall notify the data principal(s) prior to disclosing their personal information to third parties/ partner firms for purposes not previously identified in the contract agreements.
- JSW Group shall communicate the privacy practices, procedures and the requirements for data privacy and protection to the third-party vendors.

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- Third party vendors shall sign an NDA (Non-Disclosure Agreement) with JSW Group before any personal information is disclosed to the third-party vendors. The NDA shall include the terms on non-disclosure of information shared.
- JSW Group shall establish procedures that ensure protection of personal information against accidental disclosure due to natural disasters and environmental hazard.
- Any data protection and privacy incident shall be handled as per the incident management policy and procedure established by JSW Group.

6. Reference

Standards :	ISO/IEC 27001:2022 – ISMS Cl.
JSW Group Framework :	PO-001 – Information Security Management System Framework
JSW Group Policy :	PO-002 - Information Security Policy
JSW Group Procedures:	PR-011 - IT Asset Management Procedure
JSW Group Templates :	Not applicable
JSW Group Records :	Not applicable

7. Annexure

7.1. Annexure A – Definitions

Term	Definition
Personal Information (PI)	Any information that relates to an individual and that, alone or in combination with other data, can be used to identify, contact, or precisely locate an individual.
Processing	Any operation or set of operations which is performed on PII, whether or not by automated means, such as collecting, using, storing, disclosing, sharing, transferring, or disposing PII.

7.2. Annexure B – Acronyms

Acronym	Term
CIO	Chief Information Officer
ISMS	Information Security Management Systems
PI	Personal Information

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Acronym	Term	
SPDI	Sensitive Personal Data or Information	
NDA	Non-disclosure agreement	

