
AZURE POWER INDIA PVT. LTD.

POLICY

GROUP POLICY FOR DATA PRIVACY & PROTECTION

DOC. NO: C&E-PL-007

Rev. Number: 00

Date: 19-06-2024



Process owner
Compliance & Ethics Function

Approved By
CEO

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I. Introduction

A. Policy Statement. Azure Power Group (“Azure Power Group” or the “Company”) is firmly committed to respecting any applicable privacy laws and protecting the private, personal data entrusted to the Company.

B. Applicability. This Policy applies to all Relevant Individuals and all PersonalData collected, received, possessed, owned, controlled, stored, dealt with, or handled with respect to any Relevant Individual. See Paragraph VII below for Definitions.

II. Policy

A. Collection and Processing of Personal Data

1. General. Azure Power Group endeavors to collect, use, disclose, transfer, and process Personal Data: (a) for purposes that are reasonable, legitimate, and consistent with the Company’s business activities; (b) in a manner consented to by such Relevant Individual; and/or (c) as otherwise permitted by applicable law.

2. Types of Personal Data. As required by reasonable and legitimate business needs, Azure Power Group may collect from Relevant Individuals’ Personal Data, including but not limited to the following:

- a. Basic information regarding the Relevant Individual, including name, address, gender, date of birth, contact information (including emergency contact details), marital status, and citizenship and work permit details;
- b. Qualification information, such as resume or CV, education records, professional certificates, and training records (as applicable);
- c. Leave records (including annual leave, sick leave and maternity/paternity leave);
- d. Financial information relating to compensation, bonus, pension and benefits, salary, travel expenses, stock options, stock purchase plans, tax rates, taxation, bank account, and fund account details;
- e. Information captured as result of monitoring the Company’s Computer and Computer Systems; and
- f. Any other information as required by the Company

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3. Purposes of Collection. Azure Power Group (through its various functions such as finance, HR, compliance, legal, payroll etc.) may collect, process, and disclose Personal Data of Relevant Individuals for any purpose connected with the Company’s business activities (the “Business Purposes”), including the following:

- a. Managing the Relevant Individual’s employment, work, or assignment(s) with the Company;
- b. Recruiting, assessing applicants (including background checks), and onboarding or joining of Relevant Individuals;
- c. Record-keeping purposes; payroll administration, payment of the salary or invoices; performance assessment and training;
- d. Any information related to any “Know Your Customer” requirement for any financial institution or lender;
- e. Compliance with a legal requirement and obligations including but not limited inquiries made by a regulatory or law enforcement agency established under a statute, health and safety rules and other legal obligations; administration of benefits, including insurance, pension plans; and related benefits;
- f. Personnel matters, including promotions, disciplinary activities, governance, grievance procedures; and employee retention;
- g. Audits and investigations conducted by or on behalf of Company;
- h. Any other purpose as Azure Power Group deems necessary; and/or
- i. Any other purpose consented to by the Relevant Individual.

B. Disclosure and Transfer of Personal Data

1. Azure Power Group may disclose and/or transfer any Relevant Individuals’ Personal Data to its subsidiaries, as required by reasonable and legitimate business necessity without the Relevant Individual’s consent.

2. Azure Power Group may disclose and/or transfer any Relevant Individuals’ Personal Data as required by Court order, legal statute, legal process, governmental body or any other regulatory or law enforcement agency established under a statute, as per the prevailing law without the Relevant Individual’s consent.

3. Azure Power Group may, from time to time, disclose and/or transfer any Relevant Individuals’ Personal Data to the third parties, as required by reasonable

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and legitimate business necessity, without the Relevant Individual’s consent, including but not limited to, the third parties listed below:

- a. Financial institutions and lenders; payroll processing companies; and tax specialists and accountants;
- b. Internal and external auditors and/or investigators, including accounting, law, and forensic firms supporting the compliance function in the execution of its responsibilities;
- c. Administrators and managers of any Company’s pension fund or provider or insurer;
- d. External companies or third-party service providers the Company engages to perform services on Azure Power Group’s behalf, including:
 - (1) Third parties involved in merger, acquisition, investment, or business decisions, activities, or due diligence associated with the same;
 - (2) Third parties who provide due diligence related to the Company’s third party oversight program, including third party onboarding and monitoring;
 - (3) Law firms, advisors, and consultants; and
 - (4) Third Parties providing certain information technology and data processing services to enable business operations.
- e. Regulators, governmental bodies, and tax authorities, as required by law or legal process.

4. Notwithstanding the above, Azure Power Group reserves the right to decline to process any such request that may jeopardize the security and confidentiality of the Personal Data of others; is impractical; not made in good faith; or when the law permits the Company to refuse such request(s).

C. Policy Related to Sensitive Personal Data or Information

- 1. It is strictly prohibited for any Relevant Individual to use any Computer and Computer Systems to download, transmit, send, receive, store, create, or process any Sensitive Personal Data or Information.
- 2. Violation of this Policy can result in loss of the privilege of use of the Company’s Computers and Computer Systems as well as discipline, including termination of employment.

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3. If any Sensitive Personal Data or Information is collected by the Company from the Relevant Individual, for the purpose of legitimate business requirements, or in connection with any investigation, audit or enquiry, or pursuant to any legal reporting or disclosure obligation, the Company shall seek consent (as may be required under the applicable laws) from the Relevant Individual, before such data is collected, stored, processed or transmitted within or outside the Company.

D. Data Retention, Storage, and Security

1. Data Retention. Azure Power Group retains Personal Data consistent with Azure Power Group’s Maintaining Accurate Business Records and Retention Policy.

2. Storage and security - Azure Power Group takes reasonable security measures to protect Personal Data against loss, misuse, unauthorized or accidental access, disclosure, alteration, and destruction. The Company has implemented policies, procedures, and maintains appropriate technical, physical, and organizational measures and follows industry practices and standards in adopting procedures and implementing systems designed for securing and protecting Personal Data from unauthorized access, improper use, disclosure, and alteration.

III. Grievance Officer

A. Relevant Individuals may raise questions or grievances with respect to processing of Personal Data to Azure Power Group’s Grievance Officer. The Company’s Chief Human Resource Officer is designated as the Grievance Officer.

B. The Grievance Officer will expeditiously redress any grievances raised by the Relevant Individual in a manner consistent with the applicable laws and Policy. Any decisions taken by the Grievance Officer may be appealed to the General Counsel for *de novo* review.

C. For any guidance or doubts under compliance with this Policy, the Grievance Officer shall promptly consult with the Company’s General Counsel.

IV. Responsibilities of Relevant Individuals

A. All Relevant Individuals who come into possession or processing any Personal Data will comply with the applicable law and Company policy and report any violations or data/security breaches.

V. Violation of this Policy

Violation of this policy may result in disciplinary action, including termination of employment.

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VI. Authenticity of Personal Information

The Relevant Individuals on written requests can review the Personal Information provided by them and ensure that the Personal Information provided by them is not inaccurate or deficient. If any Personal Information is found to be inaccurate or deficient, the same shall be corrected or amended as feasible.

However, the Company shall not be responsible for the authenticity of the Personal Information supplied by the Relevant Individuals.

VII. Definitions

A. “Computer and Computer Systems” is defined in Azure Power Group’s Safeguarding Company Property & Use of Computers and Computer Systems Policy, Paragraph IV (Definitions).

B. “Data” means any medium, such as paper, recordings, or electronic files (whether stored on a network server, individual computer, hard disk, or separate disk from which information can be obtained by any means).

C. “Employee” means any Company employee (whether permanent, fixed-term or temporary), manager, officer, director, consultant, contractor, trainee, intern, seconded staff, agency staff, agent, or any other person associated with or acting on behalf of the Company, including its subsidiaries.


D. “Personal Data” means any information that relates to a natural person which directly or indirectly identifies an individual.

E. “Processing” means any operation or set of operations applied to Personal Data, such as data collection, recording, organization, structuring, storage, adaptation, modification, extraction, consultation, use and transmission.


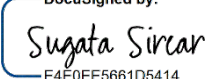
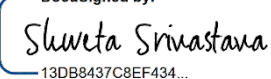
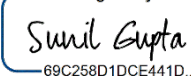
F. “Relevant Individual” means any Employee, User, job applicant, contractor, and/or any other third party working on behalf of Azure Power Group.

G. “Sensitive Personal Data or Information” means passwords, financial information, physical, physiological, or mental health conditions, sexual orientation, medical records and history, biometric information and any other detail relating to the same but does not include any personal data that is already publicly available or can be accessed through the Right to Information Act of 2005 or any other applicable laws.

H. “User” means any person who uses, has access to, or stores any Data on any Company Computer and Computer System.

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Revision History:

Rev No.	Release Date	Description of Changes	Prepared by	Reviewed & Approved By	Released By
00	19-06-2024	New Release	DGM – Compliance & Ethics	<p>Sr. VP – COMPLIANCE & ETHICS</p> <p>DocuSigned by:  <small>CD72AF582569416...</small> Vijay Kumar Wadhvani</p> <p>GROUP -CFO</p> <p>DocuSigned by:  <small>E4E0EE5661D5414...</small> Sugata Sircar</p> <p>CHRO</p> <p>DocuSigned by:  <small>13DB8437C8EF434...</small> Shweta Srivastava</p> <p>CHIEF EXECUTIVE OFFICER</p> <p>DocuSigned by:  <small>69C258D1DCE441D...</small> Sunil Gupta</p> <p>DocuSign Envelope ID: DA3BB61F-BC44-4A68-B308-C7F8BD25D815</p>	<p>ISO Cell</p> 