CESC LIMITED

DATA PRIVACY POLICY

Pursuant to the Digital Personal Data Protection Act, 2023

Effective Date: May 13, 2027

CIN: L31901WB1978PLC031411
Registered Office: CESC House, Chowringhee Square, Kolkata - 700001

PREAMBLE

CESC Limited (hereinafter referred to as "CESC", "we", "us", or "our") is committed to safeguarding the privacy and personal data of all individuals who interact with us. As a leading integrated power utility serving over 3.8 million consumers across Kolkata, Howrah, Hooghly, South 24 Parganas and North 24 Parganas, we recognize that the trust placed in us extends beyond reliable electricity supply to the responsible handling of personal information.

This Data Privacy Policy ("Policy") has been formulated in accordance with the Digital Personal Data Protection Act, 2023 ("DPDP Act") and the Digital Personal Data Protection Rules, 2025 ("DPDP Rules") to articulate our practices concerning the collection, storage, processing, and protection of digital personal data.

We encourage you to read this Policy carefully. By engaging with CESC through any channel - whether applying for a new electricity connection, using our mobile application, visiting our customer care centres, or interacting with our website - you acknowledge that you have read, understood, and agree to be bound by this Policy.

1. INTERPRETATIONS AND DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings ascribed to them below, unless the context otherwise requires:

"Board" means the Data Protection Board of India established under Section 18 of the DPDP Act.

"Consent" means any freely given, specific, informed, unconditional, and unambiguous indication of your wishes by which you, through a clear affirmative action, signify agreement to the processing of your personal data for a specified purpose.

"Consumer" means any person who is supplied with electricity for his own use by CESC and includes any person whose premises are for the time being connected for the purpose of receiving electricity with the works of CESC.

"Data Fiduciary" means CESC Limited, which alone or in conjunction with other persons determines the purpose and means of processing of personal data. CESC acts as the Data Fiduciary for all personal data collected under this Policy.

"Data Principal" means the individual to whom the personal data relates. Where such individual is a child (below 18 years of age), this includes the parent or lawful guardian. Where such individual is a person with disability, this includes the lawful guardian acting on their behalf.

"Data Processor" means any person who processes personal data on behalf of CESC pursuant to a valid contract.

"Digital Personal Data" means personal data that exists in digital form, including data collected in digital form and data that is digitized from non-digital records.

"Personal Data" means any data about an individual who is identifiable by or in relation to such data.

"Processing" means a wholly or partly automated operation or set of operations performed on digital personal data, including collection, recording, organisation, structuring, storage, adaptation, retrieval, use, alignment, combination, indexing, sharing, disclosure, restriction, erasure, or destruction.

"RP-SG Group" means RP-Sanjiv Goenka Group Private Limited, its subsidiaries, affiliates, associate companies, and joint venture entities, of which CESC Limited is a constituent member.

"Tracking Technologies" means cookies, web beacons, pixel tags, and similar technologies that collect information about your interaction with our digital platforms.

"You" or "Your" means the Data Principal accessing CESC's services, platforms, or premises.

2. SCOPE AND APPLICABILITY

2.1 This Policy applies to the processing of digital personal data of:

(a) Electricity consumers and applicants for new connections;

(b) Employees, contractual workers, and job applicants;

(c) Vendors, suppliers, and business partners;

(d) Visitors to CESC premises, including generating stations and substations;

(e) Users of CESC's website (www.cesc.co.in), mobile application, and digital platforms;

(f) Any individual whose personal data is processed by CESC in connection with its business operations.

2.2 Effective Date

This Policy shall come into effect from 13 May 2027.

2.3 Territorial Application:

This Policy applies to the processing of digital personal data within the territory of India where such data is collected in digital form or is digitized subsequently. This Policy also applies to processing of personal data outside India if such processing is in connection with any activity related to offering goods or services to Data Principals within India.

2.4 Exclusions:

This Policy does not apply to: (i) personal data processed by an individual for any personal or domestic purpose; (ii) personal data that has been anonymized in accordance with prescribed standards; and (iii) personal data made publicly available by the Data Principal or any other person who is under a legal obligation to make such data publicly available.

3. CATEGORIES OF PERSONAL DATA COLLECTED

CESC collects and processes the following categories of personal data, depending on the nature of your interaction with us:

3.1 Identity Information:

Full name, date of birth, gender, photograph, Aadhaar number (last four digits only, where permitted), PAN, Voter ID, passport number, and other government-issued identification particulars required for KYC verification.

3.2 Contact Information:

Residential and service address, mobile telephone number, landline number, email address, and emergency contact details.

3.3 Electricity Service Information:

Consumer number, meter number, sanctioned load, tariff category, connection date, premises ownership/tenancy details, consumption history, meter readings (including smart meter interval data), billing records, payment history, and service requests.

3.4 Financial Information:

Bank account details, UPI identifiers, credit/debit card information (tokenized), payment transaction records, security deposit details, and refund information.

3.5 Digital Interaction Data:

IP address, device identifiers, browser type, operating system, application version, session duration, pages visited, click patterns, and data collected through tracking technologies when you access our website or mobile application.

3.6 Communication Records:

Call recordings with our customer care helpline (1912), chat transcripts, email correspondence, complaint records, feedback, and survey responses.

3.7 Employment-Related Data (for employees and applicants):

Educational qualifications, employment history, professional certifications, salary details, provident fund information, tax declarations, bank account for salary credit, attendance records, performance evaluations, and disciplinary records.

3.8 Biometric Data:

Fingerprint data and facial recognition data collected for access control at CESC premises, generating stations, and substations (applicable to employees, contractors, and authorized visitors only).

3.9 Surveillance Data:

CCTV footage captured at CESC offices, customer care centres, substations, and other operational facilities for security and safety purposes.

4. HOW WE COLLECT YOUR PERSONAL DATA

We collect personal data through the following channels:

4.1 Direct Collection from You:

(a) When you apply for a new electricity connection or modification of existing connection; (b) When you register on our website or download our mobile application; (c) When you visit our customer care centres or interact with our field representatives; (d) When you contact our customer helpline (1912) or WhatsApp service; (e) When you submit complaints, feedback, or participate in surveys; (f) When you apply for employment or engage with us as a vendor.

4.2 Automated Collection:

(a) Smart meters and Advanced Metering Infrastructure (AMI) systems that record consumption data; (b) Tracking technologies on our website and mobile application; (c) CCTV systems at our premises; (d) Biometric devices at access-controlled locations; (e) Call recording systems when you interact with our helpline.

4.3 Collection from Third Parties:

(a) Government authorities for any legal purpose; (b) Credit information companies for creditworthiness assessment; (c) Payment gateway providers for transaction processing; (d) Background verification agencies for employment purposes; (e) RP-SG Group entities where you have consented to data sharing.

5. PURPOSE OF PROCESSING YOUR PERSONAL DATA

We process your personal data for the following lawful purposes:

5.1 Electricity Supply and Service Delivery:

(a) Processing applications for new connections, load enhancement, or category change; (b) Generating and delivering electricity bills; (c) Recording meter readings and monitoring consumption patterns; (d) Processing payments and managing security deposits; (e) Scheduling and executing meter installations, maintenance, and repairs; (f) Managing power outages and restoration notifications; (g) Handling complaints, service requests, and grievances.

5.2 Regulatory and Legal Compliance:

(a) Compliance with directions of the West Bengal Electricity Regulatory Commission (WBERC); (b) Responding to lawful requests from government authorities, courts, and tribunals; (c) Implementation of government subsidy schemes; (d) Filing statutory returns and regulatory submissions; (e) Anti-money laundering and fraud prevention measures.

5.3 Communication:

(a) Sending bill reminders, payment confirmations, and due date alerts; (b) Notifying about scheduled maintenance and power interruptions; (c) Responding to your inquiries and complaints; (d) Sending service-related updates via SMS, email, WhatsApp, or push notifications; (e) Informing about changes to tariffs, policies, or regulatory requirements.

5.4 Business Operations and Improvement:

(a) Load forecasting and network planning; (b) Energy analytics and demand-side management; (c) Improving website and application functionality; (d) Training quality assurance through review of call recordings; (e) Conducting customer satisfaction surveys; (f) Internal audits and business process improvements.

5.5 Safety and Security:

(a) Ensuring physical security of CESC premises and critical infrastructure; (b) Detecting and preventing electricity theft; (c) Protecting against cyberattacks and information security threats; (d) Managing access control to restricted areas.

5.6 Employment Purposes:

(a) Recruitment and onboarding of employees; (b) Payroll processing and statutory deductions (PF, ESI, TDS); (c) Performance management and career development; (d) Compliance with labour laws and regulations.

5.7 Marketing (with explicit consent only):

(a) Informing about energy efficiency programs and incentives; (b) Promoting value-added services offered by CESC; (c) Sharing information about offerings from RP-SG Group entities (with your separate consent).

6. LEGAL BASIS FOR PROCESSING

Under the DPDP Act, 2023, we process your personal data based on the following legal grounds:

6.1 Consent (Section 6):

For purposes such as marketing communications, sharing data with RP-SG Group entities for cross-selling, and advanced analytics on smart meter data, we obtain your explicit consent. Such consent is free, specific, informed, unconditional, and unambiguous. You may withdraw consent at any time through the mechanisms described in Section 13 of this Policy.

6.2 Legitimate Uses (Section 7):

For certain purposes, we process your data without requiring consent, as permitted under Section 7 of the DPDP Act: (a) When you voluntarily provide data for a specified purpose (e.g., new connection application); (b) When processing is necessary for compliance with any judgment, order, or decree of a court or tribunal; (c) When processing is necessary for responding to a medical emergency involving you or any other individual; (d) When processing is necessary for employment-related purposes; (e) When processing is necessary for performing any function under law or providing any service authorized by the State.

7. CONSENT: HOW WE OBTAIN AND MANAGE IT

7.1 Obtaining Consent:

Where consent is required, we obtain it through clear affirmative action. Before seeking consent, we provide you with a Privacy Notice containing: (a) The personal data to be collected; (b) The specific purpose of processing; (c) The manner in which you may exercise your rights; (d) The manner in which you may make a complaint to the Board. We do not bundle consent with acceptance of terms for a service where such consent is not necessary for providing the service. We do not use pre-ticked checkboxes or treat silence or inactivity as consent.

7.2 Granular Consent:

We offer you the ability to provide or withhold consent separately for different purposes. For example: (a) Consent for electricity supply and billing (REQUIRED for service) (b) Consent for SMS/email alerts on outages and billing (OPTIONAL) (c) Consent for promotional communications (OPTIONAL) (d) Consent for sharing data with RP-SG Group entities (OPTIONAL) (e) Consent for smart meter analytics for personalized recommendations (OPTIONAL)

7.3 Withdrawing Consent:

You may withdraw consent at any time with the same ease with which consent was given. Withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

8. SHARING OF YOUR PERSONAL DATA

We may share your personal data with the following categories of recipients:

8.1 RP-SG Group Entities:

With your separate consent, we may share your data with other RP-SG Group companies for the purpose of offering you products and services that may be of interest to you. Such sharing is governed by data sharing agreements ensuring equivalent protection of your data.

8.2 Data Processors:

We engage third-party service providers (Data Processors) to perform certain functions on our behalf, including: (a) IT infrastructure and cloud service providers; (b) Payment gateway operators; (c) SMS and email service providers; (d) Call Center operators; (e) Smart meter technology vendors; (f) Background verification agencies. All Data Processors are bound by contractual obligations to process data only as per our instructions and to maintain appropriate security measures.

8.3 Government and Regulatory Authorities:

We may disclose your data to: (a) West Bengal Electricity Regulatory Commission (WBERC); (b) Ministry of Power and Bureau of Energy Efficiency; (c) Tax authorities and statutory auditors; (d) Law enforcement agencies pursuant to lawful requests; (e) Courts and tribunals in connection with legal proceedings.

8.4 Other Third Parties:

We may share your data with: (a) Credit information companies for creditworthiness assessment; (b) Insurance companies for claims processing; (c) Banks and financial institutions for payment processing; (d) External auditors and legal advisors.

9. DATA RETENTION AND ERASURE

9.1 Retention Periods:

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable law. The following retention periods apply:

(a) Consumer account data: Termination of connection + 8 years (per Limitation Act) (b) Billing and payment records: 8 years from date of transaction (c) Meter data and consumption history: Duration of connection + 5 years (d) CCTV footage: 90 days (unless required for investigation) (e) Call recordings: 1 year from date of call (f) Employee records: Duration of employment + 8 years (g) Job application data (unsuccessful): 1 year from date of rejection (h) Access logs and digital interaction data: 1 year

9.2 Erasure:

Upon expiry of the retention period, or upon receipt of a valid erasure request from you (where no legal obligation requires retention), we shall erase your personal data. Erasure shall be carried out in a manner that renders the data irrecoverable. Where complete erasure is not feasible, we shall anonymize the data such that it can no longer be attributed to you.

10. DATA STORAGE AND SECURITY SAFEGUARDS

10.1 Storage Location:

Your personal data is stored on servers located primarily within the territory of India. We utilize secure data centres operated by reputable service providers who comply with industry security standards. Payment data is stored in compliance with RBI data localization requirements.

10.2 Technical Safeguards:

We implement the following technical measures to protect your data: (a) Encryption of data in transit (TLS 1.2/1.3) and at rest (AES-256); (b) Multi-factor authentication for access to sensitive systems; (c) Firewalls, intrusion detection, and prevention systems; (d) Regular vulnerability assessments and penetration testing; (e) Security Information and Event Management (SIEM) for real-time monitoring; (f) Data masking and tokenization for sensitive identifiers; (g) Secure backup systems with encryption. CESC Limited also maintains an Information Security Management System (ISMS) certified against ISO/IEC 27001:2022, demonstrating its commitment to the confidentiality, integrity, and availability of information assets.

10.3 Organizational Safeguards:

(a) Role-based access controls limiting data access to authorized personnel; (b) Mandatory information security training for all employees; (c) Background verification of employees handling personal data; (d) Confidentiality agreements with employees and contractors; (e) Documented information security policies and procedures; (f) Regular internal and external audits.

10.4 Log Retention:

In compliance with DPDP Rule 6, we maintain logs of all personal data processing activities for a minimum period of one year. These logs are protected against unauthorized access and tampering.

11. DATA BREACH NOTIFICATION

In the event of a personal data breach, we shall:

(a) Notify the Data Protection Board of India within 72 hours of becoming aware of the breach, providing details of the nature of the breach, categories of data affected, approximate number of Data Principals affected, and remedial measures taken; (b) Notify affected Data Principals without undue delay where the breach is likely to result in significant harm, providing clear information about the nature of the breach and recommended protective measures; (c) Document the breach, its effects, and the remedial actions taken; (d) Cooperate with the Board and any investigation conducted by it.

12. YOUR RIGHTS AS A DATA PRINCIPAL

Under the DPDP Act, 2023, you have the following rights:

12.1 Right to Access (Section 11):

You have the right to obtain from us: (a) Confirmation of whether your personal data is being processed; (b) A summary of the personal data being processed and the processing activities; (c) The identities of all Data Fiduciaries and Data Processors with whom your data has been shared.

12.2 Right to Correction and Erasure (Section 12):

You have the right to: (a) Correct inaccurate or misleading personal data; (b) Complete incomplete personal data; (c) Update personal data that is out of date; (d) Erase personal data that is no longer necessary for the purpose for which it was collected.

12.3 Right to Grievance Redressal (Section 13):

You have the right to have readily available means of registering a grievance with us. We shall respond to your grievance within the time period specified in Section 15 of this Policy.

12.4 Right to Nominate (Section 14):

You have the right to nominate any other individual who shall, in the event of your death or incapacity, exercise your rights under the DPDP Act. Such nomination may be made through our website, mobile application, or by submitting a written request to our Grievance Officer.

13. PROTECTION OF CHILDREN'S DATA

13.1 Definition of Child:

For the purposes of this Policy, a "child" means an individual who has not completed eighteen years of age.

13.2 Verifiable Parental Consent:

Before processing any personal data of a child, we obtain verifiable consent from the parent or lawful guardian of the child. We make reasonable efforts to verify that the person providing consent is indeed the parent or lawful guardian.

13.3 Restrictions on Processing:

We do not: (a) Track or monitor the behaviour of children; (b) Target advertising at children; (c) Process personal data of children in any manner that is likely to cause harm to the child.

14. GRIEVANCE REDRESSAL MECHANISM

14.1 Grievance Officer:

CESC has appointed a Grievance Officer to address your queries and grievances regarding this Policy or the processing of your personal data. You may contact the Grievance Officer at:

Name: **Sibaji Basu**

Designation: **Grievance Officer**

Address: CESC Limited, CESC House, Chowringhee Square, Kolkata – 700001

Email: grievancedpdp@rpsg.in

Phone: 9163390686

14.2 Channels for Submitting Grievances:

(a) Online: Through the Privacy Grievance Portal on www.cesc.co.in; (b) Mobile App: Through the "Privacy" section in the CESC mobile application; (c) Email: By sending an email to grievancedpdp@rpsg.in; (d) In-Person: By visiting any CESC Customer Care Centre; and (e) Helpline: By calling 033-35898801.

14.3 Response Timeline:

We shall acknowledge receipt of your grievance within 48 hours and endeavour to resolve it within 30 days from the date of receipt. Complex matters may require additional time, in which case we shall keep you informed of the progress.

14.4 Escalation to the Board:

If you are not satisfied with our response to your grievance, or if we fail to respond within the specified time, you have the right to file a complaint with the Data Protection Board of India. Information about the Board and the complaint process is available at the website of the Data Protection Board of India.

15. CROSS-BORDER DATA TRANSFERS

Your personal data is primarily stored and processed within India. We do not transfer personal data to any country or territory outside India that has been restricted by the Central Government under Section 16 of the DPDP Act. In the event that cross-border transfer becomes necessary for specific services, we shall: (a) Ensure that such transfer complies with the provisions of the DPDP Act and any rules or notifications issued thereunder; (b) Transfer data only to countries or territories that have not been restricted; (c) Ensure that adequate safeguards are in place to protect your data in the recipient country; (d) Obtain your explicit consent where required. Payment-related data is stored exclusively within India in compliance with RBI data localization directives.

16. TRACKING TECHNOLOGIES AND COOKIES

16.1 Types of Cookies We Use:

(a) Essential Cookies: Required for the operation of our website and to enable you to use its features (e.g., secure login, bill payment). (b) Analytical Cookies: Allow us to understand how visitors interact with our website, helping us improve functionality and user experience. (c) Functional Cookies: Enable enhanced functionality and personalization, such as remembering your preferences. (d) Marketing Cookies: Used to deliver relevant advertisements (only with your consent).

16.2 Managing Cookies:

When you first visit our website, you will be presented with a cookie consent banner allowing you to accept or decline non-essential cookies. You may also manage your cookie preferences through your browser settings. Please note that disabling certain cookies may affect the functionality of our website.

17. THIRD-PARTY WEBSITES AND SERVICES

Our website and mobile application may contain links to third-party websites, applications, or services that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

18. AMENDMENTS TO THIS POLICY

We may update this Policy from time to time to reflect changes in our practices, legal requirements, or for other operational reasons. When we make material changes to this Policy, we will: (a) Publish the updated Policy on our website with a new effective date; (b) Notify you through the CESC mobile application; (c) For significant changes affecting your rights, seek fresh consent where required. We encourage you to review this Policy periodically. Your continued use of our services after the effective date of any changes constitutes your acceptance of the revised Policy.

19. CONTACT US

If you have any questions, concerns, or requests regarding this Privacy Policy or the processing of your personal data, please contact us:

CESC Limited

CESC House, Chowringhee Square

Kolkata - 700001, West Bengal, India

Customer Helpline: 1912

Grievance Officer

Website: www.cesc.co.in

20. LANGUAGE

This Policy is published in English and Bengali. In case of any discrepancy between the English and Bengali versions, the English version shall prevail.

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