
CONSENT MANAGEMENT POLICY

We Respect Your Personal Data

SEW-EURODRIVE India Private Limited

Effective Date: 13-02-2026

SEW-EURODRIVE India Private Limited (“**SEW-EURODRIVE**”, “**we**”, “**our**”, or “**us**”) recognizes that obtaining and managing valid consent is important for responsible personal data processing and an essential component of compliance with the Digital Personal Data Protection Act, 2023 and its ancillary Rules (“**DPDPA**” and “**Rules**” respectively), as amended from time to time.

This Consent Management Policy (“**Policy**”) establishes a uniform, company-wide framework for obtaining, recording, managing, and withdrawing consent for the collection and processing of personal data across all departments of SEW-EURODRIVE India.

The objectives of this Policy are to:

- i. Define a structured and transparent process for managing consent throughout its lifecycle from collection to withdrawal.
- ii. Ensure that all consents obtained are free, informed, specific, unambiguous, and easily withdrawable, in accordance with the provisions of the DPDPA.
- iii. Provide clarity to all departments, employees, and stakeholders regarding their roles and responsibilities in consent management.
- iv. Reinforce SEW-EURODRIVE’s commitment to accountability, privacy by design, and ethical data governance in every business process.

This Policy applies to all instances of personal data processing undertaken by SEW-EURODRIVE India, whether through digital systems, physical documentation, or third-party platforms engaged for business, administrative, or operational purposes.

By implementing this Policy, SEW-EURODRIVE seeks to ensure that all consent-driven processing activities across the organization are conducted with lawfulness, fairness, and transparency, in alignment with both legal and organizational data protection standards.

A. SCOPE

i. **Applicability:** This Policy applies to all departments, functions, and personnel of SEW-EURODRIVE, irrespective of location, hierarchy, or function. It extends to all individuals and entities who, in the course of their engagement with SEW-EURODRIVE, have access to or process personal data, including:

- Permanent and temporary employees
- Contractual staff of SEW, trainees, and consultants
- Any other individuals including contractors, vendors, partners, authorized to collect or process personal data on behalf of SEW-EURODRIVE.

ii. **Data Coverage:** This Policy applies to all forms of digital personal data processed by SEW-EURODRIVE, whether collected directly or indirectly, including but not limited to:

- Data collected through digital interfaces such as websites, email, online forms, and HRMS systems.
- Data collected through physical interfaces such as employment application forms, visitor logs, consent declarations, or in-person documentation.
- Data processed through automated systems including security monitoring, internal communication tools, and access-control devices.

iii. **Operational Coverage:** This Policy governs the entire lifecycle of consent management within SEW-EURODRIVE India, including:

- Obtaining and documenting valid consent prior to the collection or processing of personal data
- Maintaining auditable and verifiable records of consent obtained from Data Principals
- Periodic review, renewal, or update of consent when processing purposes or conditions change
- Facilitating withdrawal or revocation of consent by the Data Principal in a timely manner, and
- Ensuring that no personal data is processed beyond the originally specified purpose, unless new consent is explicitly obtained or another lawful ground applies under the DPDPA.

iv. **Exclusions:**

This Policy does not apply to:

- Personal or domestic data processing undertaken by individuals for non-commercial purposes

- Anonymized or irreversibly de-identified data, which no longer relates to an identifiable individual, and
- Processing carried out pursuant to legal or regulatory obligations, where obtaining consent is not a requirement under the DPDPA or is categorized under ‘legitimate uses’ in DPDPA.

B. KEY DEFINITIONS

For the purpose of this Policy, and unless the context otherwise requires, the following terms shall have the meanings assigned below. All terms not defined herein shall have the meanings ascribed to them under the DPDPA and the Rules made thereunder.

- i. **“Consent”** means freely given, specific, informed, unconditional, and unambiguous indication of the Data Principal’s intent, signified through a clear affirmative action, by which the Data Principal agrees to the processing of their personal data for a specified purpose. Consent shall not be inferred from silence, pre-ticked boxes, or inactivity.
- ii. **“Data Principal”** is an individual to whom the personal data relates and who possesses the rights under the DPDPA, including the right to access, correction, erasure, grievance redressal, and consent withdrawal.
- iii. **“Data Fiduciary”** means SEW-EURODRIVE India Private Limited, which alone or in conjunction with other entities determines the purpose and means of processing personal data. SEW-EURODRIVE shall act as the Data Fiduciary for all personal data collected and processed within its organizational framework.
- iv. **“Data Processor”** is any person or entity, including a third-party service provider, who processes personal data on behalf of SEW-EURODRIVE under a valid written contract or agreement, and in accordance with SEW-EURODRIVE’s documented instructions.
- v. **“Personal Data”** means any data about an individual who is identifiable by or in relation to such data, whether directly or indirectly. Details such as name, birth date, age, home location/address, contact number, Government ID proof, IP address, Cookies and cookie IDs, employee ID, Medical records and health information, etc.
- vi. **“Processing”** means any operation or set of operations performed on personal data, such as collection, recording, organization, structuring, storage, adaptation, retrieval, use, disclosure, transmission, restriction, erasure, or destruction.
- vii. **“Notice”** means the privacy or consent notice provided by SEW-EURODRIVE to the Data Principal before or at the time of obtaining consent, informing them of the purpose, nature, and extent of data

processing, along with their rights under the DPDPA. This is a mandatory pre-requisite for obtaining consent.

- viii. **“Consent Manager”** is a person or platform registered with the Data Protection Board of India under Section 6 of the DPDPA, which enables Data Principals to give, manage, review, or withdraw their consent in a standardized manner.
- ix. **“Digital Personal Data”** means personal data collected, processed, or stored in digital form or data initially collected in non-digital form and subsequently digitized for processing.

C. CORE PRINCIPLES OF VALID CONSENT

SEW-EURODRIVE recognizes consent as the cornerstone of lawful data processing under the DPDPA. All consent obtained by SEW-EURODRIVE, whether from employees, customers, vendors, visitors, or any other data principals, shall adhere to the following fundamental principles:

- i. **Freely Given:** Consent shall be provided voluntarily, without coercion, undue influence, misrepresentation, fraud, or any form of detriment for non-provision.
 - Data Principals shall not be denied employment, services, or access to facilities solely for refusing consent to optional or non-essential processing activities.
 - Consent bundled with unrelated terms or conditions shall be considered invalid. *For instance,* consent to process personal data for employment or service delivery shall not be bundled with consent for marketing communications or data sharing with third parties.

Example: If an employee or customer is asked to agree to a single statement such as ‘I agree to the processing of my personal data for employment, training, and promotional communications,’ such consent shall be considered invalid as it combines unrelated purposes.

- ii. **Specific:** Consent must be linked to a clearly defined and lawful purpose of data processing.
 - Each distinct processing activity, e.g., employee onboarding, marketing communication, or visitor verification, shall require separate, purpose-based consent that the individual can freely give, deny, or withdraw.
 - Blanket or open-ended consents covering multiple unrelated purposes shall not be accepted.

- iii. **Informed:** Consent shall be sought only after providing the Data Principal with a clear, concise, and easily understandable Notice that includes:
- The identity of SEW-EURODRIVE as the Data Fiduciary
 - The nature and purpose of processing
 - The categories of personal data being collected
 - Information about any data sharing or cross-border transfers
 - Details of the Data Principal's rights and contact information of the Data Protection Officer (if appointed) along with the Grievance Officer or such responsible person for addressing the queries and concerns of the Data Principals.
- iv. **Unambiguous:** Consent must result from a clear affirmative act by the Data Principal that signifies agreement.
- Acceptable forms include checking a box, signing a form or declaration, or clicking an "I Agree" button linked to the full Notice.
 - Passive actions such as silence, continued use of a website, or pre-ticked boxes shall not constitute valid consent.
- v. **Easily Withdrawable:** Data Principals shall have the ability to withdraw consent as easily as it was given, without any penalty or adverse consequence.
- Withdrawal mechanisms such as email requests, HRMS portals, or website links, must be clearly accessible at all times.
 - Upon withdrawal, SEW-EURODRIVE shall cease further processing of the data concerned unless another lawful basis exists.
- vi. **Recordability and Accountability:** All consents obtained must be capable of being demonstrated upon request by internal auditors, regulators, or the Data Protection Board of India.
- Each consent instance shall be accompanied by metadata. Metadata means the complete trail, i.e., how, when, and under what conditions that consent was given.
 - The Data Privacy Steering Committee ("DPSC") is responsible for ensuring the integrity and traceability of consent records within the organisation.

D. CONSENT LIFECYCLE MANAGEMENT

SEW-EURODRIVE shall implement a standardized, organization-wide consent lifecycle management framework to ensure that all personal data processing across departments is transparent, traceable, and compliant with the DPDPA.

This lifecycle covers the entire flow of consent from collection and recording to review, renewal and withdrawal, for any digital personal data, collected through varied means such as websites, HRMS platforms, vendor interactions, or in-person engagements.

i. Obtaining Consent

- a. **Pre-Consent Notice Requirement:** Before collecting personal data, SEW-EURODRIVE shall issue a clear and plain-language Privacy Notice to the Data Principal.

The Privacy Notice shall include the identity and contact details of the Data Fiduciary, the specific purpose of data processing, the type and category of personal data being collected, details of data sharing with third parties or affiliates, if any, cross-border data-transfer information, where applicable, information about the Data Principal's rights under the DPDPA, details of the process to withdraw consent or file grievances, etc.

- b. **Modes of Obtaining Consent:** Consent may be obtained through either digital or physical means, including but not limited to the online web forms, pop-up banners, or app interfaces for digital interactions, HR onboarding documents, employment forms, or electronic HRMS submissions for employee data, email or verified digital acknowledgment for contractual or vendor data, etc. Each consent request must be purpose-specific, clearly labelled, and free from pre-ticked boxes or bundled clauses.
- c. **Multi-Purpose Processing:** When personal data is collected for multiple purposes, each purpose shall be explained distinctly, and separate consent shall be sought for each, allowing the Data Principal to selectively agree or disagree.

ii. Recording and Storing Consent

- a. **Consent Record Attributes:** Each instance of consent shall be documented in a register internally with the details such as name or identifier of the Data Principal, date and time of consent, method and medium of consent, version and language of the Notice shown at the time of consent, purpose(s) for which consent was obtained, any conditions or limitations associated with consent, etc.

b. Storage and Access Controls

- Consent records shall be securely stored in SEW-EURODRIVE's centralized data repository or a single designated departmental system with restricted access.
- Each department head shall ensure that consent logs are auditable and retained for the entire data-retention period applicable to that processing activity, as per the Retention Schedule of the organisation.
- Consent records must be retrievable within (72) hours of request by the DPO (if appointed), auditor, or regulator.

iii. Managing and Reviewing Consent

- a. Periodic Review: All consent records shall be reviewed at least annually, or sooner if the nature or purpose of data processing changes.
 - If new purpose for consent arise, fresh consent shall be sought before commencing any additional processing.
 - Stale or redundant consents and the personal data attached to such consent shall be deleted in accordance with SEW-EURODRIVE's Data Retention and Disposal Policy.
- b. Data Principal's Right to Review: Data Principals shall have the right to request a summary of all active consents linked to their data. Such requests may be made through SEW-EURODRIVE's dataprotectionofficer@seweurodriveindia.com or any future Consent Manager platform once operationalized by the Government of India.

iv. Withdrawal of Consent/Opt-Out Mechanism

- a. Process for Withdrawal: Data Principals may be allowed to withdraw their consent at any time, using any of the following channels:
 - Submitting a request through the consent withdrawal form available at [\[link to consent withdrawal form\]](#)
 - Sending an email request to sachin.gehlot@seweurodriveindia.com

b. Timelines and Compliance

- SEW-EURODRIVE shall acknowledge the withdrawal request within seven (7) working days and act upon it within thirty (30) working days from the date of acknowledgment
- Upon withdrawal, SEW-EURODRIVE shall cease processing the concerned personal data unless another lawful ground exists

- A confirmation of successful withdrawal shall be communicated to the Data Principal through email.

E. ROLES AND RESPONSIBILITIES

To ensure effective and consistent implementation of this Consent Management Policy, SEW-EURODRIVE India Private Limited assigns distinct responsibilities across all levels of the organization. Every individual who collects, processes, or manages personal data must adhere strictly to this Policy and to the obligations prescribed under the DPDPA.

i. Data Privacy Steering Committee:

SEW-EURODRIVE shall maintain a cross-functional DPSC consisting of representatives from HR, IT, Legal, Finance, Audit, Marketing and Operations, chaired by the DPO (if appointed). The Committee shall:

- a. Oversee company-wide compliance with the Consent Management Policy.
- b. Approve all templates and formats for consent notices, withdrawal mechanisms, and record-keeping systems.
- c. Ensure that consent requests across departments are consistent, lawful, and based on a valid purpose.
- d. Monitor and verify the accuracy, completeness, and retrievability of consent records.
- e. Conduct annual/bi-annual reviews of consent logs, withdrawal trends, and outstanding grievances.
- f. Recommend corrective measures, policy amendments, and process improvements.
- g. Report material findings to senior management and incorporate lessons learned into employee training and departmental SOPs.
- h. Reporting any consent-related non-compliance or data-breach incidents to senior management and, where required, to the Data Protection Board of India.

ii. Department Heads:

Each department head is responsible for implementing this Policy within their respective functional area. Their responsibilities include:

- a. Ensuring that all data-collection forms, digital interfaces, and onboarding processes under their supervision include a valid consent mechanism as per this Policy.

- b. Verifying that consent is sought only for lawful, specific, and necessary purposes.
- c. Coordinating with the DPSC to rectify any inconsistencies or process changes that affect the manner in which consent is obtained or recorded.
- d. Facilitating employee awareness and ensuring that all staff involved in data processing receive regular training on consent obligations.
- e. Promptly reporting any deviations or failures in consent collection, management, or withdrawal to the DPSC.

iii. All Employees and Contract Personnel:

Every employee, contractor, and consultant of SEW-EURODRIVE shares a collective responsibility to uphold this Policy. They must:

- a. Obtain consent only through approved company channels or templates.
- b. Avoid collecting or processing personal data without a clear and documented lawful basis.
- c. Respect Data Principals' rights, including the right to withdraw consent, without delay or prejudice.
- d. Report any breach, mis collection, or unauthorized processing of personal data immediately to the DPSC.
- e. Participate in all mandatory training and awareness programs related to data privacy and consent management.

F. VIOLATIONS AND CONSEQUENCES

To maintain integrity and accountability across all departments, SEW-EURODRIVE maintains a zero-tolerance approach toward any violation of this Policy. All employees, contractors, consultants, and third parties acting on behalf of SEW-EURODRIVE must comply with this Policy and the provisions of the DPDPA.

i. Violations of Policy: The following actions constitute violations of this Policy:

- a. Collection or processing of personal data without obtaining valid and informed consent.
- b. Failure to provide a clear and accurate Privacy Notice before or at the time of seeking consent.
- c. Processing of data beyond the purpose for which consent was obtained.
- d. Failure to record, store, or produce consent records when required by the DPO(if appointed), DPSC or regulatory authority.
- e. Failure to act upon a consent-withdrawal request within the prescribed timeline.

- f. Unauthorized disclosure, misuse, or sharing of consent records.
 - g. Failure to report a suspected consent-related breach within twenty-four (24) hours of discovery.
 - h. Non-compliance by third-party vendors or processors with SEW-EURODRIVE's consent obligations.
- ii. Consequences of Violation:** Depending on the severity of non-compliance, disciplinary or contractual action may include:
- a. Written warning or reprimand.
 - b. Mandatory data-privacy re-training.
 - c. Suspension or restriction of data-handling privileges.
 - d. Termination of employment or contractual relationship.
 - e. Notification to regulatory or law-enforcement authorities, where legally required.
- iii. Vendor and Third-Party Accountability:**
- a. Vendors or service providers collecting personal data on behalf of SEW-EURODRIVE found in breach of contractual consent obligations may face immediate suspension or termination of engagement.
 - b. SEW-EURODRIVE reserves the right to seek indemnification for losses or damages caused by such breach.
 - c. All such incidents shall be documented and reviewed by the DPSC.

G. REPORTING MECHANISM

To uphold transparency, accountability, and compliance with data protection obligations, SEW-EURODRIVE maintains a structured reporting and escalation mechanism for addressing any incident, non-compliance, or concern arising under this Policy or the DPDPA.

1. **Reporting Obligation:** All employees, contractors, vendors, and third-party partners are obligated to promptly report any actual or suspected incident involving:
 - Breach, unauthorized disclosure, or misuse of personal data
 - Non-compliance with consent-handling procedures or withdrawal requests
 - Unauthorized access to consent records or personal data
 - Any deviation from the processes established under this Policy.

Reports must be raised immediately upon discovery and in no case later than twenty-four (24) hours from identification of the incident or irregularity.

2. **Reporting Channels:** Reports or concerns shall be submitted through one of the following official channels:

Data Protection Officer:

Name: Sachin Gehlot

Email: dataprotectionofficer@seweurodriveindia.com

Phone: +91 9725017748

Address: Plot No. 4, GIDC Por, Ramangamdi, Vadodara, Gujarat

Grievance Redressal Officer:

Name: Vikas Johri

Email: grievanceofficer@seweurodriveindia.com

Phone: +91 9725017781

Address: Plot No. 4, GIDC Por, Ramangamdi, Vadodara, Gujarat

Reports may be submitted confidentially or anonymously in good faith, and shall be treated with strict confidentiality and fairness in accordance with SEW's internal whistle-blower and grievance redressal framework.

This Policy is an internal governance framework of SEW-EURODRIVE and forms part of the Company's overall data-protection and compliance program. It is intended to ensure that all employees, contractors, and authorized third parties act in accordance with applicable Indian data-protection laws.

SEW-EURODRIVE may amend or update this Policy at any time to reflect changes in law, business practices, or regulatory expectations. The most recent approved version, as maintained by the DPSC, shall be deemed authoritative and binding within the organization.