7SEAS ENTERTAINMENT LIMITED
PERSONAL DATA RETENTION, ERASURE AND DATA PRINCIPAL RIGHTS SOP

(Approved/Amended by the Board of Directors on 18 July 2026)

CIN: L72900TG1991PLC013074

Registered Office: 5th Floor, Plot Nos. 92, 93 and 94, Kavuri Hills, Madhapur, Hyderabad, Telangana – 500081

Classification: Internal and confidential

1. Purpose

This SOP translates the DPDP Policy into operational requirements for data inventories, retention schedules, erasure, consent withdrawal and exercise of Data Principal rights.

2. Data inventory and retention schedule

Each system owner shall document data category, Data Principal group, source, purpose, legal basis, system, processor, location, access, retention trigger and disposal method. Retention shall be purpose-based and supported by a legal or business requirement. Indefinite default retention is prohibited.

3. Purpose completion and erasure

When the specified purpose is no longer served and retention is not legally necessary, personal data shall be erased or irreversibly anonymised. Deletion shall extend to active systems and processors and to backups in accordance with secure rotation, subject to technical feasibility and legal hold.

4. Request intake and authentication

Requests may be received through systems@7seasent.com or an approved portal. Identity shall be authenticated proportionately without collecting excessive additional data. Requests shall be logged with category, date, owner, deadline and outcome.

5. Access and information requests

The response shall provide a summary of personal data being processed, processing activities, identities or categories of processors/persons with whom data was shared where required, and the complaint channel, subject to statutory limitations and protection of others' rights.

6. Correction, completion and updating

Verified inaccurate, incomplete or outdated data shall be corrected in relevant systems and communicated to processors where necessary. Evidence of the correction and affected systems shall be retained.

7. Erasure and consent withdrawal

Erasure requests shall be assessed against purpose and legal-retention requirements. Withdrawal shall stop future consent-based processing within a reasonable time and preferences shall be synchronised across systems. Reasons shall be provided when full erasure cannot lawfully be completed.

8. Grievance and nomination

Privacy grievances shall be investigated and responded to within the prescribed period. Nomination requests shall be recorded after appropriate verification and used only upon the Data Principal's death or incapacity in accordance with law.

9. Metrics and assurance

Periodic reports shall cover volumes, ageing, refusals, processor delays, deletion failures and complaints. Sample testing shall confirm that retention rules and consent withdrawals operate in production systems.

10. Interpretation and overriding effect

Terms not specifically defined in this Policy shall have the meanings assigned to them under the Companies Act, 2013, the rules made thereunder, the applicable SEBI regulations and other governing law. References to statutes and regulations include amendments, clarifications, circulars and re-enactments. If any provision of this Policy conflicts with applicable law, the law shall prevail and this Policy shall be read as modified to the minimum extent necessary.

11. Administration and responsibility

The Board shall retain overall responsibility for this Policy. The committee or officer identified in this Policy shall administer it, maintain evidence of compliance and report material deviations. Every director, officer, employee, consultant and service provider within scope shall provide information and cooperation reasonably required for implementation.

12. Records, training and assurance

The Company Secretary/Compliance Officer shall ensure that approvals, registers, declarations, notices, reports, training records and supporting documents are retained for the period prescribed by law and the Company's document-retention schedule. Periodic awareness and role-based training shall be conducted. Internal audit or an independent reviewer may test compliance and recommend corrective action.

13. Review and amendment

This Policy shall be reviewed at least annually and earlier upon a material change in law, business model, organisation, risk profile or regulatory guidance. Material amendments shall be placed before the competent committee and the Board. The Managing Director and Company Secretary/Compliance Officer may jointly make clerical, contact-detail and statutory-reference corrections that do not alter substantive rights or obligations, subject to reporting to the Board.

For 7Seas Entertainment Limited
Company Secretary / Compliance Officer

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