

POLYCAB INDIA LIMITED MOBILE PRIVACY POLICY

Polycab India Limited and subsidiaries (“we”, “us”, “our”, “Polycab India Limited”) are committed to protecting your privacy. This Privacy Policy (“Policy”) describes our practices in connection with information privacy on Personal Data we process through your individual use of the following services, products, and related mobile applications (collectively, the “Products”):

Red Carpet Mobile Application

In this Privacy Policy, “Personal Data” means information that can be used to identify an individual, either from that information alone, or from that information and other information we have access to about that individual. Polycab Red Carpet App is a loyalty app for Consultants, Contractors and Architects. It is built to appreciate long term association with them.

For other branded mobile applications powered by Polycab India Limited, our clients control all the Personal Data collected through our Products. We collect the information under the direction of our clients and the processing of such information shall be limited to the purpose of providing the service for which our clients has engaged us. If you are a customer of one of our clients and would no longer like to be contacted by one of our clients that use our service, please contact the client that you interact with directly.

What Personal Data do we collect?

In order to provide our services to you, we will ask you to provide necessary Personal Data that is required to provide those services. If you do not provide your Personal Data, we may not be able to provide you with our products or services.

1. Information You Voluntarily Provide Us

- a) Account or Profile Data: When you register an account with us, we may collect your name and contact details, such as your email address, phone number, user name, and login credentials. During your interaction with our Products, we may further collect your nickname, profile picture, country code, language preference or time zone information into your account.
- b) Feedback: When using feedback and suggestion features in our Products, we will collect your email address, mobile phone number and your feedback content to address your problems and solve device failures on a timely basis.

2. Information We Collect Automatically

- a) Device Information: When you interact with our Product, we automatically collect device information, such as the MAC address of your devices, IP address, wireless connection information, operating system type and version, application version number, push notification identifier, log files, and mobile network information.
- b) Usage Data: During your interaction with our Sites and Services, we automatically collect usage data relating to visits, clicks, downloads, messages sent/received, and other usage of our Sites and Services.

- c) Log Information: When you use our app, the system and exception log may be uploaded.

3. Location Information: We may collect information about your real-time precise or non-precise geo-location when you use our specific products or services.

4. Application Related Information:

- a) Basic Information of: Polycab Red Carpet App is a loyalty app for Consultants, Contractors and Architects. It is built to appreciate long term association with them.
- b) Information Reported: [Leads, BOQ, PO, Invoice information may be collected in the App and subsequent points will be allocated to respective members as per the logic defined. The flow shall go through State Heads, Regional Heads, BU SPOCs of different Business Units. Points shall be credited to each member on the various uploads based on approvals from the respective POCs as per the workflow.

Purposes and legal basis for processing Personal Data
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The purpose for which we may process information about you are as follows:

- 1. Provide You Services:** We process your account and profile data, device information, usage data, location information, and Polycab Red Carpet App related information to provide you with benefits associated with the program. The legal basis for this processing is to perform our contract with you according to our Terms of Use.
- 2. Improve Our Services:** We process your device information, usage data, location information and Polycab Red Carpet related information to ensure the best of services based on relevant member details. This will help us build long term relations, analyze efficiency of our operations and trace & prevent fraudulent or inappropriate usage. The legal basis for this processing is to perform our contract with you according to our Terms of Use.
- 3. Non-marketing Communication:** We process your personal data to send you important information regarding the services, changes to our terms, conditions, and policies and/or other administrative information. Because this information may be important, you may not opt-out of receiving such communications. The legal basis for this processing is to perform our contract with you according to our Terms of Use.
- 4. Marketing Communication:** We may process your personal data to provide marketing and promotional materials to you on our products and services. If we do so, each communication we send you will contain instructions permitting you to opt-out of receiving future communications of that nature. The legal basis for this processing is your consent. Additionally, if you consent to participate in our lottery, contest or other promotions, we may use your Personal Data to manage such activities.
- 5. Personalization:** We may process your account and profile data, usage data, device information to personalize product design and to provide you with services tailored for you, such as recommending and displaying information and advertisements regarding products suited to you, and to invite you to participate in surveys relating to your use of our Products. The legal basis for this processing is your consent.

- 6. Legal Compliance:** We may process your Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable laws and regulations; (b) to comply with legal process; (c) to respond to requests from public and government authorities (d) to enforce our terms and conditions; (e) to protect our operations, business and systems; (f) to protect our rights, privacy, safety or property, and/or that of other users, including you; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Who do we share Personal Data with?
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1. At Polycab India Limited, we only share Personal Data in ways that we tell you about. We may share your Personal Data with the following recipients:
- a) To our third-party service providers who perform certain business-related functions for us, such as website hosting, data analysis, payment and credit card processing, infrastructure provision, IT services, customer support service, e-mail delivery services, and other similar services to enable them to provide services to us.
 - b) To our customers and other business partners who provide you, directly or indirectly, with your devices through which you use the mobile application.
 - c) To an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings). In such an event, you will be notified via email and/or a prominent notice on our website of any change in ownership, incompatible new uses of your Personal Data, and choices you may have regarding your Personal Data.
 - d) As we believe to be necessary or appropriate: (a) to comply with applicable laws and regulations; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations, business and systems; (f) to protect our rights, privacy, safety or property, and/or that of other users, including you; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
 - e) To subsidiaries or affiliates within our corporate family, to carry out regular business activities.

We may process your personal information on servers not in your home country. You consent to the transfer of your personal information to any other geographic location. If you are accessing the website or mobile application from outside India, please be advised that Indian law or the laws of any other jurisdiction where we or our service providers process your personal information would also apply to the manner in which we collect, retain, use or process your personal information, and in certain circumstances, your personal information may be accessible to law enforcement and regulatory authorities in accordance with the laws of these other jurisdictions.

Your Rights Relating to Your Personal Data

1. We respect your rights and control over your Personal Data. You may exercise any of the following rights:

Via the "Profile – Personal Center" in our Products

You do not have to pay a fee and we will aim to respond you within 30 days. If you decide to email us, in your request, please make clear what information you would like to have changed, whether you would like to have your Personal Data deleted from our database or otherwise let us know what limitations you would like to put on our use of your Personal Data. Please note that we may ask you to verify your identity before taking further action on your request, for security purposes.

You may:

- a) Request access to the Personal Data that we process about you;
 - b) Request that we correct inaccurate or incomplete Personal Data about you;
 - c) Request deletion of Personal Data about you;
 - d) Request restrictions, temporarily or permanently, on our processing of some or all Personal Data about you;
 - e) Request transfer of Personal Data to you or a third party where we process the data based on your consent or a contract with you, and where our processing is automated; and
 - f) Opt-out or object to our use of Personal Data about you where our use is based on your consent or our legitimate interests.
2. For the purpose of this policy, the Personal Data" means any information relating to an identified or identifiable natural person; an "identifiable natural person" is an individual who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier (including but not limited to a screen name, username or social media handle) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person; and "Processing" means any operation or set of operations (whether automatic or manual) performed upon Personal Data or sets of Personal Data, such as collecting, recording, organizing, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing by transmission, disseminating or otherwise making available, aligning or combining, restricting, erasing or destructing. To the extent the confidential information includes Personal Data, you shall process Personal Data as per this Privacy Policy which is intended to be in line with the law of the land and industry standards. You shall keep the Personal Data secure and implement appropriate technical, physical, administrative and organizational safeguards and measures (1) to ensure the continued security, confidentiality, integrity, availability and resilience of the systems used to process the Personal Data, and (2) to restore availability and access to the Personal Data without delays, in case of incident or security breach. This shall include, but not be limited to taking or following the appropriate industry standard measures to prevent the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data; promptly notify us of any third party requests or complaints relating to the processing of Personal Data; assist us in responding to Personal Data subjects' queries to exercise their statutory rights, and generally complying with any applicable legal or regulatory requirements and to demonstrate compliance with the obligations imposed upon us or our affiliates by any applicable legislation, and allow for and contribute to audits, including inspections, conducted by us or any third party auditor selected or authorized by us or any regulator or supervisory authority having jurisdiction over us;

and inform us without delay if you discovers or suspects that any processing breaches applicable statutory or regulatory provisions, you shall be responsible for establishing and maintaining an information security program that is at all times compliant with the requirements set forth in this Privacy Policy and applicable law. You shall ensure that your employees, agents, contractors and other representatives do not store Personal Data on any: (a) portable computing device including, but not limited to, cell phone, smartphone or laptop; or (b) removable media, such as compact disc, flash drive or tape, unless the Personal Data is encrypted using state-of-the-art techniques and processes.

Security

We use commercially reasonable physical, administrative, and technical safeguards to preserve the integrity and security of your Personal Data. Polycab India Limited provides various security strategies to effectively ensure data security of user and device. As for device access, Polycab India Limited proprietary algorithms are employed to ensure data isolation, access authentication, applying for authorization. As for data communication, communication using security algorithms and transmission encryption protocols and commercial level information encryption transmission based on dynamic keys are supported. As for data processing, strict data filtering and validation and complete data audit are applied. As for data storage, all confidential information of users will be safely encrypted for storage. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you could immediately notify us of the problem by emailing legal@polycab.com.

Data Retention

We process your Personal Data for the minimum period necessary for the purposes set out in this Privacy Policy, unless there is a specific legal requirement for us to keep the data for a longer retention period. We determine the appropriate retention period based on the amount, nature, and sensitivity of your Personal Data, and after the retention period ends, we will destruct your Personal Data. When we are unable to do so for technical reasons, we will ensure that appropriate measures are put in place to prevent any further such use of your Personal Data.

Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes, we will notify you by email (send to the e-mail address specified in your account) or by means of a notice in the mobile applications prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

If you have any questions about our practices or this Privacy Policy, please contact us as follows:

Polycab India Limited

Postal Mailing Address: 771, Polycab House, Mogul Lane, Mahim(W), Mumbai- 400016

Email: legal@polycab.com