

# PRIVACY POLICY

**Tata Elxsi Limited** (“TEL” or “we”, “us” and “our”) is sensitive to privacy issues on the Internet and is committed to safeguarding the privacy of your information. This privacy policy explains what personal data we collect from you through our interactions with you on this website and how we treat such information we receive from you on the Internet.

#### INFORMATION WE COLLECT:

In general, you can visit our website without telling us who you are or revealing any information about yourself. Our web servers collect the domain names, not the e-mail addresses, of visitors. This information is aggregated to measure the number of visits, average time spent on the site, pages viewed, etc. We use this information to measure the use of our site and to improve the contents. Certain technical information may be collected automatically for security and analytics purposes. You're accessing our site to allow the collection of your domain names including cookie consent should be governed only by the Cookie Policy.

There are times when we may need your information, such as:

- First Name:
- Last Name;
- Business E-mail Id:
- Address:
- Telephone/Mobile Number:
- Company:
- Job title/Designation:
- Role:
- Location:

The above information is collected from you, if you:

- Contact us via post, e-mail, or telephone and provide any personal data
- Complete online contact form

#### HOW WE USE YOUR PERSONAL DATA:

The personal information we collect is used only by us to:

- Respond to your inquiry, process an order, or allow you to access specific information;
- Provide our services;
- Maintain back-ups of our databases containing your personal data;
- Perform contract between you and us and/or taking steps, at your request, to enter into such a contract;
- Protect the security and safety of our website;
- Communicate with you and personalize our communications with you;
- Execute other activities such as marketing campaigns, promotional communications for which consent is taken appropriately or another appropriate lawful basis for the processing is identified. Additionally, you can sign up for e-mail subscriptions and choose whether you wish to receive promotional communications from TEL by e-mail, SMS, post, and telephone or other means of communication;
- Ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution;
- Conduct data analytics studies to review and better understand customer satisfaction and needs.

We will only use your personal information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify

you, and we will explain the legal basis which allows us to do so. Please note that we may process your personal information, in compliance with the Policy, where such processing is required or expressly permitted under applicable law..

#### HOW DATA WILL BE SHARED:

We may share or disclose your personal information:

- to any member of our group of companies (this means our subsidiaries, our parent/ultimate holding company, and all its subsidiaries) insofar as reasonably necessary for the purposes and on the legal bases set out in this Policy.
- where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal processes, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- with third-party vendors, service providers, contractors, or agents who perform services for us or on our behalf and require access to such information to do that work.
- in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- with our business partners to offer you certain products, services, or promotions. We may disclose your personal information for any other purpose with your consent.

#### COOKIES:

A technology called cookies may be used to provide you with tailored information. A cookie is a tiny element of data that a website can send to your browser, which may then be stored on your hard drive so we can recognize you when you return. You may set your browser to notify you when you receive a cookie. Certain technical information may be collected automatically for security and analytics purposes. Cookie consent shall be governed by the Cookie Policy.

At times, we conduct online surveys to better understand the needs and profiles of our visitors. When we conduct a survey, we will try to let you know how we will use the information at the time we collect information from you on the Internet.

You may accept or decline the cookies used by our website by modifying the settings in your browser - view the help menu to change your cookie preferences. If cookies are disabled, this may mean that you are not able to take full advantage of all the features on our site. Please refer to the [Cookie Policy](#)

#### LINK TO OTHER SITES:

Tata Elxsi's website may contain links to other sites such as Tata Elxsi's partners and affiliates. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites.

#### PRINCIPLES OF DPDPA, GDPR, CCPA, APPI AND UAE PDPL:

We will use your personal data only in line with the DPDPA, GDPR, APPI, CCPA and UAE (PDPL) principles. When we process personal data about you, we do so with your consent and/or as necessary to provide the website you use, operate our business, meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfill other legitimate interests of TEL as described in this privacy policy.

When we collect and use personal data (information) about the residents (data subjects) of the European Union, we may be subject to the General Data Protection Regulation ('GDPR') of the European Union and responsible as a 'data controller' for such personal data.

When we collect and use personal information about residents (consumers) of the United States, we may be subject to the California Consumer Protection Act (CCPA) and responsible as a 'business' or 'service provider' for such personal data.

When we collect and use personal data about individuals (Data Principals) in India, we act as a 'Data Fiduciary' and are responsible for ensuring lawful purpose, data minimization, accuracy, storage limitation, and implementing appropriate security safeguards.

When we collect and use personal data about individuals in Japan, we act as a Business Operator Handling Personal Information under the Act on the Protection of Personal Information (APPI) and are responsible for ensuring a lawful and specified purpose of use, data minimization, accuracy, appropriate retention and deletion practices, and the implementation of necessary and appropriate security control measures.

When we collect and use personal data about individuals in the United Arab Emirates, we act as a Data Controller under UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL) and are responsible for ensuring lawful, fair, and transparent processing, purpose limitation, data minimization, accuracy, storage limitation, and the implementation of appropriate technical and organizational security safeguards.

All information in this privacy notice is applicable to you unless otherwise indicated based on your residency status. If you are a resident of the European Union, references to GDPR will be applicable to you. If you are a resident of the United States, references to the CCPA may be applicable to you. If you are a resident of the India, references to the DPDPA will be applicable to you. If you are a resident of the Japan, references to the APPI may be applicable to you. If you are a resident of the United Arab Emirates, references to the UAE PDPL may be applicable to you

We are required under data protection legislation to notify you of the information contained in this privacy notice.

#### **YOUR INFORMATION:**

You recognize and understand that there is no compulsion on you to provide us with your personal information. Any and all personal information provided by you to us is with your full consent, own volition, and desire to provide such personal information. You are not obligated to provide your personal information to TEL; however, certain information may be necessary to respond to your request or provide specific services.

You also understand that we are under no obligation to verify the source from which the personal information about you is provided to us, and they are deemed to be provided by you unless you demonstrate to us within a period of fifteen days from the date of providing of such information to us, to our satisfaction, that the information was provided to us without your free consent.

Under **GDPR**, the lawful basis for processing maybe:

- for the performance of a contract with you or to take steps at your request before entering into a contract with you or our legitimate interests in behaving as a responsible organization in dealing with these matters, or consent, where requested and obtained.
- is our legitimate interest in enabling and improving our website and online services, or consent, where requested and obtained.
- is the consent, where requested and obtained.
- is for promoting our brand, products, services, initiatives, and values, on consent, where requested and obtained.

Under **CCPA**, the lawful basis for this processing:

- is to fulfill or meet the reason you provided the information.



- is to provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- is to respond to law enforcement requests and as required by applicable law court orders or government regulations.

Under **DPDPA**, the lawful basis for this processing:

- is your consent, which is free, specific, informed, and unambiguous, obtained before collecting or processing your personal data through this website.
- is for the performance of obligations under a contract with you, or to take steps at your request before entering into such a contract.
- is for compliance with applicable Indian laws and regulations, including tax, legal, and statutory requirements.
- is for certain legitimate uses permitted under DPDPA, including compliance with law, performance of employment-related obligations, or other uses expressly permitted by law.

Under **(APPI)**, the lawful basis for processing may be:

- for the performance of a contract with you or to take steps at your request before entering into a contract with you.
- for achieving our specified and disclosed purpose of use, including enabling and improving our website and online services.
- the consent is requested and obtained, particularly where the processing involves special care-required personal information or provision to third parties.
- for promoting our brand, products, services, initiatives, and values, within the scope of the disclosed purpose of use, or on consent, where requested and obtained.

Under the **UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (UAE PDPL)**, the lawful basis for processing may be:

- for the performance of a contract with you or where processing is necessary to meet our legal or regulatory obligations.
- necessary for our legitimate interests, including enabling, operating, securing, and improving our website and online services, provided such interests do not override your rights, or consent, where requested and obtained.
- the consent is requested and obtained, particularly where processing involves sensitive personal data, biometric data, or health-related information, unless otherwise permitted by law.
- for promoting our brand, products, services, initiatives, and values, in accordance with applicable marketing laws, or on consent, where requested and obtained.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

#### **YOUR RIGHTS:**

You have the right to access personal information that we hold or process about you and to request information about: –

- What personal data is being held
- The purposes of processing the information
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

You have the right to request the erasure of your personal data or restrict processing the data according to the data protection law or object to any direct marketing from us and be informed about any automated decision-making that we use. In addition, if you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information, and we will strive to update/correct as we use it.

If we receive a request for any of the above rights, we may ask you to verify your identity before acting on the relevant request to ensure that your data is protected and kept secure. In addition, if you create an online account with us, you are able to modify and update your own personal information by logging into your user account.

### **Rights of EU data subjects under GDPR**

If the processing of your personal information is subject to the EU General Data Protection Regulation (“GDPR”) (or any United Kingdom replacement legislation), you are entitled to the rights listed below.

Inform us of changes. Please keep us informed if there is a change in your personal data. Your rights in connection with personal data:

Under certain circumstances, by law, you have the right to:

- Request access to your personal data (commonly known as a “data subject access request”), enabling you to receive a copy of the personal data we hold about you.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation, which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal data.
- Request for a Data Portability. You may ask us, in certain circumstances, to provide you with the personal data you have provided to us in a structured, commonly used, and machine-readable format or to transmit the personal data that you have provided to us to another party.
- Not to be subject to a decision based solely on automated processing that produces legal effects concerning you or similarly significantly affects you.

### **Rights of the Data Principals under DPDPA, 2023.**

If the processing of your personal information is subject to DPDPA, you are entitled to the rights listed below.

In case of any changes to your personal data, please keep us informed during your relationship with us.

Your rights in connection with personal data:

Under certain circumstances, by law, you have the right to:

- Request and obtain a copy of the personal data an organization holds about you and understand how it is being used.
- Ask for correction of inaccurate, incomplete, or outdated personal data.
- Request deletion of your personal data when it is no longer needed, consent is withdrawn, or processing is unlawful, subject to legal obligations.
- To withdraw consent at any time. If data processing is based on consent, you can withdraw it at any time, and processing must stop unless legally required.
- Raise grievances with the data controller/fiduciary and expect timely resolution.
- nominate another person to exercise your data protection rights on your behalf in case of death or incapacity.

### **Rights of US Consumers under the CCPA**

If the processing of your personal information is subject to the CCPA, you are entitled to the rights listed below.

**Changes to your personal data.** Please keep us informed if your personal data changes during your relationship with us.

Your rights in connection with personal data

Under certain circumstances, by law, you have the right to request that we disclose certain information to you about our collection and use of your personal information:

- Request access to the personal data we collected about you and categories of sources for the personal information we collected about you.
- Request erasure of your personal data.
- Right of know the business or commercial purpose for collecting or selling the personal information. Please note that we do not sell your personal data under any circumstances; this right may only apply where we disclose your personal data for a business purpose.
- Categories of third parties with whom we share the personal information
- You can ask us, in certain circumstances, to provide you with the personal data you have provided to us in a structured, commonly used, and machine-readable format or to transmit the personal data that you have provided to us to another party.
- **Right to opt-out:** This enables you to opt-out of the sale of your personal data by a business to other third parties. We do not sell your personal data under any circumstances; this right does not apply to your personal data with us.
- We will not discriminate against you for exercising any of your CCPA rights.
- In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

### **Rights of the Data Subjects under APPI**

If the processing of your personal data is subject to Japan's Act on the Protection of Personal Information (APPI), you are entitled to the rights listed below.

In case of any changes to your personal data, please keep us informed during your relationship with us.

Your rights in connection with personal data:

Under certain circumstances, and subject to applicable law, you have the right to:

- Request disclosure of your personal data held by an organization and obtain information regarding the purpose of use and handling of such data.
- Request correction, addition, or deletion of your personal data if it is inaccurate, incomplete, or outdated.
- Request cessation of use or cessation of provision to third parties where your personal data is being handled beyond the disclosed purpose of use or unlawfully.

- Withdraw your consent, where processing is based on consent, following which the organization must cease processing unless otherwise permitted or required by law.
- Request explanations regarding the handling of your personal data, including security control measures, to the extent permitted by law.

### **Rights of the Data Subjects under UAE Data Protection Law**

(UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data)

If the processing of your personal data is subject to the UAE Data Protection Law, you are entitled to the rights listed below. In case of any changes to your personal data, please keep us informed during your relationship with us.

Your rights in connection with personal data:

Under certain circumstances, and subject to applicable law, you have the right to:

- Request access to and obtain a copy of your personal data held by an organization and understand how it is being processed.
- Request correction of inaccurate, incorrect, or incomplete personal data relating to you.
- Request erasure of your personal data where it is no longer necessary for the purpose for which it was collected, consent has been withdrawn, or processing is unlawful, subject to legal or regulatory obligations.
- Withdraw your consent at any time, where processing is based on consent, without affecting the lawfulness of processing prior to withdrawal.
- Object to or restrict the processing of your personal data in certain circumstances in accordance with applicable law.

If you exercise one of the above rights, we may need to request specific information from you to help us confirm your identity and that you are entitled to make such a request. This is to ensure that personal data is not disclosed to any person who has no right to receive it. We will only use personal information provided in an opt-out request to review and comply with the request.

These rights may be limited, for example:

- If fulfilling your request would reveal personal data about other person; where it would infringe the rights of a third party (including our rights); or
- If you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

### **CHILDREN'S PERSONAL DATA:**

Our website and services are not directed at children, and we do not knowingly collect or process children's personal data except, where permitted by law and with verifiable parental or legal guardian consent, as required under applicable data protection laws. If we become aware that children's personal data has been collected without appropriate consent or lawful basis, we will take reasonable steps to delete such data promptly or otherwise cease processing, unless retention is legally required. Parents or legal guardians may contact us to exercise rights or raise concerns on behalf of a child.

#### WHERE WE STORE AND PROCESS PERSONAL DATA:

Personal data collected by TEL may be stored and processed in your region, India, and any other country where TEL or its group companies, affiliates, subsidiaries, or service providers operate facilities. The storage location(s) are chosen to operate efficiently, improve performance, and create redundancies to protect the data in the event of an outage or other problem.

We take steps to ensure that the data we collect under this privacy statement is processed according to the provisions of this Policy and the requirements of applicable law wherever the data is located.

We may transfer personal data from the European Economic Area to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. When we do, we use various legal mechanisms, including contracts, to help ensure your rights and protections travel with your data.

#### DATA SECURITY:

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

#### RETENTION OF PERSONAL DATA:

We retain personal data for as long as and/or for no longer than we are permitted to do by applicable law, regulation, tax or accounting practice or authorizations to which we may be subject.

Where maximum or minimum data retention periods are not otherwise stipulated, we determine appropriate retention period for the personal data by considering: the amount, nature and sensitivity of the personal data contained in the records; the potential risk of harm from unauthorized use or disclosure of personal data; the purposes for which we process the personal data and whether we may be able to achieve those purposes through other means; whether the personal data can be permanently and effectively anonymized; the security measures in place in relation to that personal data and any other relevant factors. Withdrawal of consent does not affect our obligation to retain specific information where legal or legitimate grounds require continued data storage.

#### DO WE NEED YOUR CONSENT?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights. We may approach you for your written consent in limited circumstances to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract that you agree to any request for consent from us.

#### CHANGES TO THIS PRIVACY POLICY:

We reserve the right to update this privacy statement at any time. Therefore, we recommend that you re-visit this Policy from time to time to learn of any such changes to this Policy. We may also notify you in other ways from time to time about processing your personal information.

#### CONTACT US:

If you have any further questions or comments about us or this Policy, e-mail us at [Info@tataelxsi.co.in](mailto:Info@tataelxsi.co.in)

If you wish to exercise any of your individual data-protection rights, you can contact our Data Privacy Team at [TE\\_Dataprivacy@tataelxsi.co.in](mailto:TE_Dataprivacy@tataelxsi.co.in).