

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. Your accessing our site signifies your unconditional consent to allow the collection of your domain names.

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 without your knowledge or consent, in compliance with the Policy, where this is required or permitted by 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. Registering with any Tata Elxsi business unit online signifies your unconditional consent to receive such cookies.

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 Websites 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 GDPR AND CCPA:

We will use your personal data only in line with the GDPR and CCPA 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.

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 will 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, as it is required so that we can process your requests and meet our business obligations, we will be unable to provide you with our services without it.

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 this 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.

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 it 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 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.

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.

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 will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We will only retain personal information for as long as necessary and have strict review and retention policies in place to meet these obligations.

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