

7.0. Policy:

7.1 Privacy Policy Summary:

We in TATA STEEL UISL are committed to protection of privacy of individual in business and professional activities.

While handling and / or dealing with any personal information including sensitive personal data or information, we assure that:

- We will safeguard personal data and information.
- We will keep personal data and information complete, accurate and up to date.
- We will always limit use of personal information to the extent that we reasonably require to deliver our products / services, and also to administer our business.
- We will permit only the authorised personnel to have the access to personal data and information.
- Whenever we hire other organisations to provide services, they would conform to our privacy policy and also allow us to audit for compliance.

We undertake not to divulge any personal information, except where we are required by law to respond to statutory authorities or any Court or legal authority.

7.2 Privacy Policy

This Privacy Policy helps stakeholders concerned understand how TATA STEEL UISL handle and deal with Personal Information including Sensitive personal Data or Information.

The Privacy policy above covers the following:

- Collection of Personal Information
- Use of Personal Information
- Disclosure of Personal Information
- Protection of Personal Information
- Review and updating of Personal Information
- Changes to Privacy Policy
- Definitions used in this policy

7.2.1 Collection of Personal Information

All authorised locations and employees of TATA STEEL UISL, and authorized third parties may collect various types of Personal Information including Sensitive personal Data or Information as required for business under laws and regulation and based on desire and consent of individual concerned.

This Personal Information including Sensitive personal Data or Information may include but are not limited to:

- Personal Information: Person's name, age, gender, date of birth, photographs, password etc.
- Contact Information: Person's address, telephone numbers, e-mail etc.
- Financial Information: Any detail pertaining to bank account, credit/debit cards, payment instruments, annual income, investment/savings, Income Tax (PAN Card, Form 16 etc.)
- Health Information: Person's Height, Weight, illness / diseases, Medical Reports etc.
- Other Information: Any Information used as proof of Identity, proof of address, proof of age, proof of income etc.

In case the individual do not provide his consent for usage of personal information and / or withdraw his consent for usage of personal information, TATA STEEL UISL reserves the right to discontinue or cancel its services or engagement for which the said information was sought from the individual.

7.2.2 Use of Personal Information

All Personal Information including Sensitive personal Data or Information is held in accordance with the applicable laws and regulations for use in number of lawful purposes connected with business and professional activities, which may include but are not limited to:

- Verification of identity as per prevalent laws and regulation;
- Processing individual's request and providing individual concerned with products and /or services requested
- Settling the accounts with those who provide services
- Dealing with requests, enquiries or complaints and other customer care related activities; and all other general administrative and business purposes;
- Carrying out market and product analysis and marketing our companies' products and services and communicate updates, offers and promotion.
- Customer analytics on usage pattern and deliver customized content and advertising that may be of interest to individual
- Provide individual concerned with best of customer experience
- Address network integrity and security issues
- Carrying out any activity in connection with a legal, governmental or regulatory requirement, for the purpose of compliance of a legal obligation, in connection with legal proceedings, in connection with prevention, detection , investigation including cyber incidents, prosecution, and punishment of offences protect and defend our rights or property or act in an emergency to protect someone's safety or to help investigations, monitor or prevent or take action regarding unlawful and illegal activities, suspected fraud, potential threat to the safety or security of any person.
- Carrying out activities connected with the running of our business such as personnel training, quality control, network monitoring, testing and maintenance of computer and other systems and in connection with the transfer of any part of our business in respect of which you are a customer or a potential customer;

7.2.3 Disclosure of Personal Information

Any Personal Information including Sensitive personal Data or Information at times may be disclosed where it is necessary to third parties such as:

- Other companies that provide services directly to customers on behalf of TSUISL or provide services to us by collecting, receiving, processing, storing, dealing or handling customer information. To enable these partners to do this, TSUISL may need to share personal information and/or Sensitive personal Data or Information with them.
- Anyone TSUISL transfers business to in respect of a customer or a potential customer;
- To any other entity or organization in order for them to understand the environment and consequently, provide better services.
- Handing over data for migration to new IT platform in case of adoption of new systems or migration of an existing system to a new platform.

TATA STEEL UISL may share Personal Information including Sensitive personal Data or Information, without obtaining any prior written consent of individual with government agencies mandated under the law to obtain information including Sensitive Personal Data Or Information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, or where disclosure is necessary for compliance of a legal obligation.

Any Personal Information including Sensitive Personal Data or Information may be required to be disclosed to any third party by us by an order under the law for the time being in force.

7.2.4 Protection of Personal Information

TATA STEEL UISL shall take steps to ensure that the personal information including Sensitive personal Data or Information is stored in secure environment protected from unauthorized access, modification or disclosure as long as required for business or otherwise required under the law. However, while we strive to use commercially acceptable means to protect the Personal Information, we cannot guarantee its absolute security.

7.2.5 Review and updating of Personal Information

TATA STEEL UISL strives to keep personal information always updated with the latest to the extent possible. To this end if individual see any discrepancy or part of personal information changes with time, he/ she is expected and encouraged to inform to get the personal information updated with the latest.

7.2.6 Changes to Privacy Policy

TATA STEEL UISL reserve the right to update this policy as necessary from time to time. Customer's continued use of the Service after we post any modifications to the Privacy Policy published on our website will constitute customer's acknowledgment of the modifications and consent to abide and be bound by the modified Privacy Policy.

7.2.7 Definitions in Privacy Policy

"Personal information" means any information that relates to a natural person which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

"Sensitive personal data or information of a person" means such personal information which is related to:

- i.** Password
- ii.** Financial information such as Bank account or credit card or debit card or other payment Instrument details
- iii.** Physical, physiological and mental health condition
- iv.** Sexual orientation
- v.** Medical records and history
- vi.** Biometric information

provided that any information that is freely available or accessible in public domain or furnished under Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.

For the purposes of this policy document, a 'Third Party' is a service provider who associates with TATA STEEL UISL and is involved in handling, managing, storing, processing, protecting and transmitting information of TATA STEEL UISL and also includes all sub-contractors, consultants and/or representatives of the Third party.

7.3 Enforcement

- 1.** This policy is applicable to all the employees and third parties of TATA STEEL UISL who have access to and use the information assets and IT assets as listed in the Information Asset List which have been created for all the business groups/departments. Any violation shall be dealt in accordance with the disciplinary action process as laid down in the Code of Conduct.
- 2.** Violations by third parties shall also come under purview of this policy and would be treated accordingly.
- 3.** Management's interpretation of clauses in this procedure shall be final and binding to all concerned. Management reserves rights to alter or amend any clause in this policy anytime as per discretion.