

## PRIVACY POLICY

www.ttipl.co.in (“**Website**”) is a website owned and operated by Toyota Tsusho India Private Limited, its group companies, subsidiaries, affiliates, business partners and associates (hereinafter referred to as “**We**”, “**Us**” and “**Our**” as the context may require). We are committed to protecting the privacy of Our users, visitors, partners, customers, business associates and all other persons who access the Website or otherwise provide any information to Us (herein referred to as “**You**” and “**Your**” as the context may require). This Privacy Policy describes the manner in which We collect, store, process, use, transfer and disclose Your information *inter alia* through the Website. By using or accessing the Website You hereby accept and consent to the terms of this Privacy Policy.

We reserve the right to change/amend the terms of this Privacy Policy without notice from time to time. You are requested to review this page periodically, to remain aware of any changes or amendments to this Privacy Policy.

### 1. Nature of Information Collected

#### 1.1. Information provided by You

All information provided to Us by You during any interactions with Us including but not restricted to using of the Website, any business meetings and/or interactions, which may comprise of:

- 1.1.1. “**Personal Information**” such as name, address, telephone number, email address, gender, Your preference and interests, or any other information which may be capable of identifying You; and
- 1.1.2. “**Sensitive Personal Information**” such as passwords and any financial information provided while accessing the Website (including credit card, debit card or other payment instrument information etc), physical, physiological and mental health condition; sexual orientation; medical records and history; biometric information; any detail relating to the above as provided to Us for providing any service or for the purposes set out in *paragraph 2*; and any of the information received in this *paragraph 1.1.2* from You for processing, stored or processed under a lawful contract or otherwise.

Any information provided to Us by You which is freely available or accessible in the public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as Sensitive Personal Information for the purposes of this Privacy Policy.

We do not collect Sensitive Personal Information unless the information is collected for a lawful purpose connected with Our functions or activities and the collection is considered necessary for that purpose.

#### 1.2. Information collected by Us

- 1.2.1. Technical information such as Your IP Address, login information, operating system, browser type, the page served, time preceding page viewed, search history, length of visits, metadata (data about other information collected, such as date, time, size etc) (collectively referred to as “**Usage Information**”).
- 1.2.2. Log file information, i.e. information automatically reported by Your browser upon accessing the Website.

- 1.2.3. Small bits of data which identify remote devices such as mobile phones, computers, tablets or other devices used to access the Website (“**Device Identifiers**”). Some mobile service providers may also provide us with the physical location of the devices used to access the Website.
- 1.2.4. Demographic data, profile data about users and behavioural information such as advertisements clicked on, products viewed, reviews read etc.
- 1.2.5. Professional details such as designation, name of Your organization and such other details informed during business meetings and/or interactions (collectively referred to as “**Business Contact Data**”).
- 1.2.6. Personal Information and Sensitive Personal Information such as employee’s name, gender, date of birth, citizenship, marital status, address, contact details, educational background, job history, bank details, medical records and any other information voluntarily given or submitted by employee in the course of his/her employment (collectively referred to as “**Employee Data**”).

### 1.3. **Cookies**

- 1.3.1. Cookies are alphanumeric identifiers or files that We transfer to Your devices through Your browser to enable Our systems to recognise Your browser and to provide certain personalized features.
- 1.3.2. Most browsers allow You to prevent the browser from accepting new cookies or disable cookies altogether. Each browser is different; so check the ‘help’ menu of your browser to learn how to change your cookie preferences. Since cookies allow You to take advantage of some of the Website’s essential features, We recommend that You leave them turned on. Please refer to 1.3.3 below for additional information on how We use cookies. If You choose to decline cookies, You may not be able to use other interactive features on Our Website.
- 1.3.3. We may use cookies for a number of purposes, including to:
  - (1) Provide general internal analytics;
  - (2) Study traffic patterns in order to improve Website performance, to customise Your experience, and to better match Your interests and preferences;
  - (3) Keep track of preferences You specify while You are using Our Website’s services;
  - (4) Support security measures, such as requiring re-login into the Website after a certain time period has elapsed;
  - (5) Save Your username and password, if You login to Our Website, so that We can process the saved information and quickly log You into the Website;
  - (6) Assist in identifying possible fraudulent activities.

## 2. **Use of Information**

We use Your information in the following ways and for the following purposes:

- 2.1. To provide safe, efficient, smooth and customised experience on the Website and allow You to participate in the features We offer on the Website.
- 2.2. To send communications to You about Our current services, new services or promotions that we are developing, and business opportunities that may be available to You;
- 2.3. To enforce any terms of use (as may be applicable from time to time) and minimise and protect You from fraud and other criminal/illegal activity.
- 2.4. To carry out obligations arising from contracts between You and Us including but not restricted to provision of customer services.
- 2.5. To provide You with information, products and services that You have requested/subscribed for, or agreed to receive.
- 2.6. To measure and understand the effectiveness of content provided to You and to tailor content for You, including delivering relevant advertisements.

- 2.7. For inter-company transfers and other business purposes, and/or any internal operations such as troubleshooting, data analysis, research, testing and service improvement of the website, and to improve the Website.
- 2.8. With respect to Business Contact Data, to communicate with you, the proper administration of our website and business, and the preparation of or performance of a contract between Us and You or Your organisation.
- 2.9. With respect to Employee Data, to manage the employment relationship between Us and Our employees, including payroll, compensation and benefits of administration; employee relation and discipline; performance review; secondment and transfer; employee development and training; talent management and succession planning such as overseas job posting & deployment; Information Technology-systems communication and security; regulatory compliance; governmental and/or agencies, regulatory and/or statutory bodies requirement; and work and business-related requirements.
- 2.10. To respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, and
- 2.11. To fulfil other purposes disclosed at the time You provide Your information or otherwise, with Your consent.

By providing Your information to Us, including through the Website and/or submitting Your information You consent to such use of Your information, including Your Personal Information as well as Sensitive Personal Information about You and also Your Business Contact Data and Your Employee Data.

### **3. Transfer and Disclosure of Information**

- 3.1. We may share Your information, including Personal Information and Sensitive Personal Information among Our subsidiaries, group companies, affiliates, business partners, suppliers and sub-contractors for processing in order to provide You the best quality of services or for internal reasons, primarily for business and operational purposes. Such subsidiaries, group companies, affiliates, business partners, suppliers and sub-contractors may be located within or outside India. Before sharing your Sensitive Personal Information outside India, we will ensure that the same level of data protection is adhered to by the transferee or the country where the transferee is located.
- 3.2. We may transfer Your information, including Personal Information and Sensitive Personal Information to third parties, in case of transfer of Our business assets or ownership (such as in case of merger, acquisition, bankruptcy, liquidation etc.). In such event You will continue to remain the owner of such information and the buyer/transferee will continue to honour the terms of this Privacy Policy.
- 3.3. We may transfer Your information, including Personal Information, Sensitive Personal Information, Usage Information and Device Identifiers to third parties if We are under a duty to disclose or share such information in order to comply with any legal obligation, or where we believe in good faith that the law requires it, or at the request of governmental authorities conducting an investigation or in order to enforce, verify or apply Our terms of use and other agreements or policies, or to protect Our rights, property, or safety and the rights, property or safety of Our users, customers or others or to respond to an emergency. Such disclosure may be carried out with or without notice to You.
- 3.4. We may engage third parties to perform functions on Our behalf, such as hosting or operating Our Website, sending email communications, enable storing of Personal Information or Sensitive Personal Information and data analysis. We may share Your Personal Information and Sensitive Personal Information with third parties in order for them to provide content or otherwise perform services for Us, and We will require such parties to maintain appropriate security practices to protect such information from unauthorised access or processing.

By providing and/or submitting Your information to Us, including through the Website and/or submitting Your information You consent to such transfer and disclosure of Your information including Your Personal Information, Sensitive Personal Information, Your Business Contact Data and Your Employee Data.

#### **4. Storage of Information**

- 4.1. Your information collected by Us is stored on Our systems in India and/or outside the territory of India, by Us or Our subsidiaries, group companies, affiliates, business partners, suppliers and sub-contractors.
- 4.2. Your information shall be stored only for the period necessary for purposes specified in *paragraph 2*.

By providing Your information to us, including through the Website and/or submitting Your information in any other manner, You consent to such storage of Your information, including Your Personal Information, Sensitive Personal Information, Your Business Contact Data and Your Employee Data.

#### **5. Your Rights**

- 5.1. You have the right to withdraw Your consent to the use, disclosure or transfer of Your information mentioned in *paragraph 1.1*. However, in such event We reserve the right to refuse or limit Your access and use of Our Website and its features, including the services offered on Our Website.
- 5.2. You have the right to update or correct Your information provided under *paragraph 1.1*. You may exercise such right by reaching out to Our grievance officer through the details given below.

#### **6. Grievance Notice**

- 6.1. If You have grievance questions or comments regarding this Privacy Policy, please contact Mr. A Murali, Company Secretary at ([murali@ttopl.co.in](mailto:murali@ttopl.co.in))
- 6.2. Grievance notice can be sent with respect to any complaints or concerns including those pertaining to breach of Our terms of use and Privacy Policy.

#### **7. Security Practices**

- 7.1. We strive to ensure the security, integrity and privacy of Your information and to protect Your information against unauthorized access or unauthorized alteration, disclosure or destruction.
- 7.2. For the above purpose, We have adopted internal reviews of the data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where Your information is stored.
- 7.3. We use appropriate technologies and procedures to protect Your information. Our information security policies and procedures are closely aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet Our business needs, changes in technology, and regulatory requirements.  
However, in order to facilitate more effective data protection, We urge You to take steps to keep Your information safe, by memorising Your passwords, or keeping them in a safe place (separate from Your account information), logging out of user accounts, and closing Your web browser.

- 7.4. We reserve the right to amend this Privacy Policy from time to time, for legal or regulatory reasons. A notice of such amendments will be made available to You through the Website. It is clarified that all amendments to this Privacy Policy will take effect from the date of such amendment's notification on the Website and We will not be liable for any actions taken by You without any reference to the amended terms of the Privacy Policy.

**Effective Date:** This Privacy Policy is effective as of 1<sup>st</sup> April, 2019, subject to amendment of its terms from time to time.