

## **PREAMBLE AND LEGAL FRAMEWORK**

This Privacy Policy (“**Privacy Policy**”) governs the collection, use, disclosure and protection of personal information/ data of individuals that may get entered in to or shared by such individuals when accessing or making use of any of the Apps of **Finolex Cables Limited** (the “**Company**”) including through ‘**FINOLEX SMART WIZ**’ (‘**Augmented Reality (AR) App**’) or Company’s web protection of stores (‘**Stores**’). This Privacy Policy is intended to provide clear and complete information about the personal information of such users that get collected on the Company’s Apps when the users access any of the Apps with a view to transacts on the Stores or browse or make use of any of the facilities that can be accessed from the Company and the manner in which such personal information/ data gets stored and/ or be used by the Company.

The Board of Directors of the Company (the “Board”), at its meeting held on 12<sup>th</sup> October 2020 has approved this policy. The policy will be effective from 12<sup>th</sup> October 2020.

### **BY USING ANY OF THE SERVICES OR BY OTHERWISE GIVING THE COMPANY YOUR PERSONAL INFORMATION, YOU AGREE TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY**

#### **I. PERSONAL INFORMATION COLLECTION**

Through your accessing any of the Apps of the Company or use of the Services thereunder, FCL may collect Personal Data from you (especially, if you choose to provide it), including without limitation:

- Your name, email, username, phone number, address, (“Contact Information”);
- Your gender, age;
- Your credit card number, billing address, shipping address, KYC document details and other payment transaction and verification details (“Payment Information”);
- Pages and products viewed, items added to your shopping cart, ads that you clicked on, emails from the Company that you opened, browser type, operating system (“OS”), Internet Protocol (“IP”) address and device and location information (collectively, “Analytical Information”);
- Publicly available information about you from third-party sources, such as the postal service for shipping address verification;
- Mobile OS, a mobile device identifier embedded in your mobile, or other commonly used mobile device identifiers.
- It can also include what you see through features we provide, such as our camera, so we can do things like suggest products and filters that you might like, or give you tips on using camera formats.
- We collect information about how you use our products, such as the types of content you view or engage with; the features you use; the actions you take; and the time, frequency and duration of your activities. For example, we log when you're using and have last used our Products and other content you view on our Products. We also collect information about how you use features like our camera.

When you use our Website, we collect and store your Personal Information in order to record, support and facilitate your participation in the activities you select, track your preferences, to notify you of any updated information and new activities and other related functions offered by the Us, keep you informed about our latest, special offers, and other

products and services available on/at the Website/Store, to assist you with customer service or technical support issues, to follow up with you after your visit to the Website/Store. For the aforesaid purpose, we only collect such personal information that we consider relevant to understand you or your interests/ needs.

## II. USE AND SHARE OF INFORMATION

We use the Information to understand your needs and accordingly facilitate our services and will customize the services as per your requirements. We do not sell, rent, trade or exchange any personally identifying information of our users. We may share your information with our affiliates, vendors, and sub-contractors etc to support the operation of the Website/Stores / App.

- a) We may also use the Information to provide contents and services that are targeted to your interests. By accepting Privacy Policy, you expressly agree to receive this communications/information. If you do not wish to receive these communications, you may opt out of the receipt of certain communications by sending an email at [customerservice@finolex.com](mailto:customerservice@finolex.com) specifying the details of such communication/information you do not want to receive.
- b) We may share your Personal Data with affiliated and unaffiliated companies that perform tasks on our behalf related to our business. Such tasks include processing payments, fulfilling orders, delivering packages, locational services, analyzing website or mobile application usage data, customer service, electronic and postal mail service, contests/surveys/sweepstakes administration, marketing services, social commerce and media services (e.g., ratings, reviews, forums), and calculating, managing and reporting sales tax. Third-party service providers receive your Personal Data as necessary to perform their role, and we instruct them not to use your Personal Data for any other purposes.
- c) There may be instances when we disclose your information to other parties to comply with the law or respond to compulsory legal process OR to verify or enforce compliance with the policies governing our Services; and to protect the rights, property, or safety of the Company, or any of our respective affiliates, business partners, or customers.
- d) We may share information about you with companies that aggregate it to provide analytics and measurement reports to our affiliates, business partners or customers.
- e) We may share information with law enforcement agencies or in response to legal requests in the circumstances outlined below.
- f) We may use your Contact Information to receive and respond to your questions about products, services or warranties and to communicate with you about contests, surveys or sweepstakes. To address your questions, we may also request your industry and/or the name and address of the dealer that sold you our product
- g) We may use your current location, provided address and/or pin code to provide you the location of the retailer of our products or other appropriate information.
- h) We may use your username, email address, products purchased, and other user-generated content you may provide when you rate and review our products.

We may also use your Personal Information in other ways that are consistent with the above-described purposes and to otherwise administer our websites and provide our Services to you.

Your Personal Data will be retained by us as long as necessary to provide you with the services and products requested. Once you have ended your relationship with us, we will at your request either delete your Personal Data or anonymize your Personal Data, unless statutory retention requirements apply (such as for taxation purposes). We may retain your contact details and interests in our products or services for a longer period of time if you have allowed us to send you marketing materials. We may also retain your Personal Data after the termination of the contractual relationship if your Personal Data is necessary to comply with other applicable laws or if we need your Personal Data to establish, exercise or defend a legal claim, on a need to know basis only. To the extent possible, we will restrict the processing of your Personal Data for such limited purposes after the termination of the contractual relationship.

We may share and/or transfer your Personal Data with a third party in such transactions (including without limitation, any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets).

### **III. Protection and Security of Information collected by the Company :**

We take all reasonable technical measures to protect your Personal Information once received. We use security measures consistent with current acceptable practices to protect your Personal Information. These measures include technical, procedural, monitoring and tracking steps intended to safeguard data from misuse, unauthorised access or disclosure, loss, alteration or destruction.

We also have physical, electronic, and procedural safeguards that comply with the applicable laws prevalent to protect Personal Information about you and, accordingly, we take appropriate security measures to protect against unauthorised access, alteration, disclosure or destruction of Your Personal Information, to ensure the protection and preservation of your privacy. However, please note that no data transmissions over the Internet can be guaranteed to be 100 % secure or safe. Consequently, we cannot ensure or warrant the security or safety of any information you transmit to us and you understand that any information that you share is done at your own risk and responsibility.

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

This Service does not use these "cookies" explicitly. However, the app may use third party code and libraries that use "cookies" to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse the cookies, you may not be able to use some portions of this Service.

#### **IV. Legal Requirements:**

We rely on the following legal grounds for the collection, processing, and use of your Personal Data:

- the processing is necessary to provide the Services as requested by you;
- your consent;
- the processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract;
- the processing is necessary for compliance with a legal obligation to which we are subject;
- the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party

#### **V. Data Protection Officer :**

If you have reason to believe that your interaction with us is no longer secure (e.g., if you feel that the security of any account you might have with us has been compromised), please immediately notify us by email [customerservice@finolex.com](mailto:customerservice@finolex.com) Where we have given you or you have chosen a password which enables you to access certain portions of our websites, you are responsible for keeping this password confidential. Under no circumstances should you share your password with anyone.

#### **VI. CHANGES IN THIS POLICY:**

We reserve all rights to from time to time update our Privacy Policy. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page.

#### **VII. CONSENT**

You agree that you have accessed the Website/virtual Stores/ App and have provided Information on your own initiative and are responsible for compliance with all applicable laws. This Privacy Policy is governed by the laws of India and the courts at Pune shall have exclusive jurisdiction

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