

PRIVACY POLICY

We care about your privacy

1.0 Introduction

Tech Mahindra Limited, including its Affiliates and group entities (“TechM”, “we”, “our”, “us”) provides IT & ITES services to enterprises (the ‘Services’).

We collect information as described in this Privacy Policy (“Policy”) that you, as a user or Visitor of our **Manav** (our **virtual human platform**) (a “User”, “you” or “your”) provide to us or that we learn about you or any third parties from your use of our Manav (virtual human interface) (the “Site” “Application”, “Manav”), or while you avail our Services through the Manav (“Use”) or otherwise. We are committed to protect any personally identifiable information (“Personal Information”) (as described in section 4.1 below) that you provide when you are Using the Manav. Uniform practices for collecting, using, disclosing, storing, retaining, disposing, accessing, transferring or otherwise processing such information assists TechM to process Personal Information fairly and appropriately, disclosing it, using it and/or transferring it only under appropriate circumstances.

This Policy tells you how we use your Personal Information collected through the Manav. Please read this Policy before using the Manav or availing the Services through the Manav or submitting any Personal Information. This Policy will be updated upon any changes in information collection, activities performed or applicable regulations.

2.0 Purpose

The purpose of this Policy is to highlight various obligations, best practices and tools that support compliance with data privacy regulations applicable to TechM in its role as a data controller or data processor and your consent for such activities if required.

3.0 Applicability

This Policy is applicable while you Use the Manav and does not apply to any website(s), mobile sites and mobile apps of third parties, even if their websites/products are linked to or thru the Manav. If you do not agree with this Policy, please do not Use this Manav. The Policy considers the rights and obligations under the data protection laws applicable to the User / if the User is an EEA resident, then as set forth in the EU General Data Protection Regulation (Regulation (EU) 2016/679, (“GDPR”).

3.1 What lawful reasons/purposes do we have for collection, storage, processing of Personal Information?

We rely on the following lawful reasons when we process your Personal Information to provide you the Services:

a. Contract - We may process your Personal Information in order to perform our contractual obligations to which you are a party. We may process your Personal Information to administer and develop our business relationship with you and, if applicable, the corporate or other legal entity you represent.

b. Legal obligations - We may process Personal Information to enforce and comply with the law, including to conduct an investigation, to protect the property and/or rights of TechM or a third party, to protect the safety of the public or any person, or to prevent or stop activity which we may consider to be, or which poses a risk of being illegal, fraudulent, unethical or legally actionable.

c. Legitimate Interest: We have the right to use Personal Information in our 'legitimate interests'. The interests can include the purposes that are justified by the nature of our business activities, such as the marketing analysis of Personal Information.

d. Consent – if we collect your Personal information on the basis of Consent as a legal basis, We may rely on your freely given, specific, informed and unambiguous consent at the time you provided your Personal Information to us for one or more specific purposes. Responsibility for consent, collection, use, storage and other obligations under applicable regulations for the Personal Information of your clients/employees/third parties whom you provide onto the Site shall rest with you as data controller and TechM shall not carry any responsibility or liability towards the same other than as data processor to the extent you authorize TechM to process it.

4.0 Collection and use of information

4.1 Collection of your information

We collect, processes, and retains information about you when you Use this Site. You may voluntarily choose to provide us with Personal Information.

PLEASENOTE:

The only personal information we collect is the user's email address, which is required solely for the purpose of signing up.

4.1.1 Children

No information may be submitted to TechM by or about persons under the age of 18 (eighteen) or any other legal age defined by the law of land ("children") without the consent of a parent or legal guardian, nor may children make purchases or other legal acts on Manav without such consent. TechM encourages all parents or guardians to instruct their children in the safe and responsible use of their Personal Information while Using Manav. TechM will not knowingly collect or use any Personal Information collected from children for any purpose whatsoever.

4.2 How we use your Personal Information

Any information we collect from you may be used in one of the following ways:

A. When you Use Manav:

- a) Select content, improve quality and facilitate use of the other interface channels: We may use your Personal Information to help create and personalize content on our Site, facilitate your use of Manav (for example, to facilitate navigation and the login process, avoid duplicate data entry,

enhance security, improve quality, track campaign and survey responsiveness and evaluate page response rates).

- b) **Sharing information with third parties:** We may share Personal Information and other information with third parties who provide services to TechM for website management, information technology and related infrastructure provision, e-mail delivery, auditing, and other similar services, each of which service providers will act as data processors. When TechM shares Personal Information with third party service providers, we require that they use your Personal Information to contact you about a TechM offer in support of your business needs or to conduct online surveys to understand better the Users' needs and profiles. This is only for the purpose of providing such third-party services to us and subject to terms consistent with this Policy.
- c. **Provide you Services:** You have provided your consent that the Personal Information that we collect will be used to provide you access to the Manav and further to provide intended services through Manav. Any Personal Information that you upload for the Services shall be capable of being used only by you and not by TechM for any purpose, provided however that you may provide your consent, for TechM to use the Personal Information as data processor, at any time, including without limitation, at the time of termination of the relationship for TechM to update or delete your contacts related information, or delete any cache related to your Use of the Manav.
- d. If you are a U.S. resident, we process your personal data in accordance with applicable U.S. state data privacy laws, including the California Consumer Privacy Act (CCPA).
- e. We do not sell your personal data. So, we do not offer an opt-out to the sale of personal data.

5.0 Fairness and Purpose

We will collect adequate, relevant and necessary Personal Information, and will process such information fairly and lawfully for the purpose it is collected. The purpose of collection will be specified not later than at the time of data collection, or on each occasion of change of purpose.

6.0 Accuracy of information

The information held by TechM on the Manav shall be checked by You from time to time to ensure that it remains up-to-date. We may also conduct a check about its accuracy from time to time for the purpose. Should Your personal circumstances change, you should notify us and update your details by logging in with your credentials or by writing to us at dpo@techmahindra.com immediately.

7.0 Distribution of Information

7.1 Information Disclosure

We do not share, sell, rent, or trade Personal Information collected through Manav with third parties otherwise than as outlined in this Policy. We may share information with third party service providers contracted to provide services on our behalf. These third-party service providers may only process information we provide to them as requested and instructed by TechM.

- a) We may disclose your Personal Information as we believe to be necessary or appropriate:
 - o under applicable law, including laws outside your country of residence;
 - o to comply with legal process;

- to respond to requests from public and government authorities, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes;
 - to enforce our terms and conditions;
 - to allow us to pursue available remedies or limit the damages that we may sustain;
 - with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when:
 - permitted or required by law; or,
 - trying to protect against or prevent actual or potential fraud or unauthorized transactions; or,
 - investigating fraud which has already taken place; and
 - with external advisors acting as processors (e.g. lawyers, accountants, auditors, etc).
- b) Additionally, in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), we may transfer the Personal Information we have collected to the relevant third party. A prominent notice will appear on our Site for 30 days after any such change in ownership or control of your Personal Information.

7.2 Cross-Border Data Transfers

Personal Information we hold about you may be transferred to countries:

- a. where we do have branches and subsidiaries;
- b. which are linked to your engagement with us to opt for the Services of Manav;
- c. from which you regularly receive or transmit information;
- d. as a result of obtaining the third party services provide in clause 4.2(b) above; and/or
- e. to other TechM entities or third parties that are located outside of the TechM operation's country of business

We may share non-personal, anonymized and aggregated information with third parties for several purposes, including data analytics, research, submissions, thought leadership and promotional activity.

While permissible data transfer mechanisms are defined by applicable law or regulation, examples include:

- A data transfer agreement with the TechM entity or third party who will access or obtain the Personal Information;
- Notice to and/or approval from a country's local data protection authority; or
- Notice to and/or consent from the individual whose data is to be transferred.

8.0 Consent and Control

8.1 Consent

Consent is an individual's choice to "opt-in" or "opt-out" of the Company's use of Personal Information

and is usually obtained by a “check box” or signature confirming the individual understands and agrees to the processing of their Personal Information. By clicking on “I agree”, you hereby consent to the following:

1. Collecting, using, storing or processing your Personal Information, including sensitive Personal Information, in certain ways or sharing the individual’s Personal Information with any third party;
2. Transferring your Personal Information outside of your country of residence including, without limitation, to India where TechM’s data centers and support staff are located;
3. Using or placing web cookies on your computer or other electronic devices.

8.2 Control of your information and Revocation of Consent

TechM also provides individuals with the right to control their Personal Information, which includes the right to access, rectify, modify, erase, restrict, transmit, or object to certain uses of their information and right to ask us to provide you your Personal Information which you have provided to us in a structured, commonly used and machine-readable format.

You may request to review, correct, update, suppress, or otherwise modify any of your Personal Information that you have previously provided to us from your Use of Manav, or object to the use or processing of such Personal Information by us. If you have questions about your account or are having trouble accessing your account, please contact us via email at “dpo@techmahindra.com”. In your request, please make clear what Personal Information you would like to have changed, deleted or suppressed from our database or what limitations you would like to put on our use of your Personal Information that you have provided to us.

While the majority of questions and issues related to access can be handled quickly, complex requests may take more research and time. In such cases, issues will be addressed, or you will be contacted regarding the nature of the problem and appropriate next steps, within thirty (30) days.

9.0 Data Storage

9.1 Storing of Personal Information

Your Personal Information may be stored in a different region depending upon Your location or in compliance with regional regulations. Irrespective of where the Personal Information is stored, it shall be stored in that region locally and shall not be replicated in other regions. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to another location, we will protect it as described in this Policy.

Your Personal Information will be retained in a form which enables TechM to identify the individual for no longer than it is necessary for the purposes for which the data was collected and used. Your Personal Information may be retained in certain files for a period of time as required by applicable law and following TechM’s data retention policies in order to comply with such financial or legal requirements, to properly resolve disputes or to troubleshoot problems. If you wish to cancel your account or request that we no longer use your Personal Information to provide you services, contact us via the information in Section 8.2 above.

TechM shall retain your Personal information only as long as necessary for the fulfilment of the stated purposes, which shall not exceed a maximum of 14 days from the date of upload and shall be permanently deleted thereafter.

10.0 Commitment to data security

10.1 Data Security

We have implemented appropriate technical and organizational measures to safeguard and help prevent unauthorized access to your Personal Information and to maintain data security. These safeguards take into account the sensitivity of the information that we collect, process and store and the current state of technology. We follow generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it. The third parties with whom the Personal Information may be shared shall be validated as compliant with the commitment to data security as per the applicable laws.

We assume no liability or responsibility for disclosure of your Personal Information due to errors in transmission, unauthorized third-party access or other causes beyond our control.

Users of our Site are responsible for maintaining the security of any password, user ID, or other form of authentication involved in obtaining access to password protected or secure areas of any TechM websites. Access to and use of password protected and/or secure area of the Site is restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution.

10.2 Use of cookies

Cookies are pieces of information stored directly on the computer or mobile device that you are using. Cookies allow us to collect information such as browser type, e-mail address when you are logged-in to your e-mail from the browser you are using, time spent on the online services, pages visited, including the Site, referring URL, language preferences, and other aggregated traffic data.

We collect and store information when you Use the Site, and this may include using cookies or similar technologies to identify your browser or device. We use cookies to collect and store information when users interact with services we offer to our partners. Our analytics product helps to personalize users' experience while using the online services. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to our users and display them while they are using the online services or to send them advertisements and marketing emails. You can configure your browser to refuse cookies, or to warn you before a cookie is placed. If you disable cookies, some parts of our Site may not function properly or at all.

10.3 Transfers outside EEA. If you are resident of the EU / EEA:

TechM may transfer Personal Information outside of the country where the Users are located. Some recipients of their Personal Information are located in another country for which the European Commission or ICO has not issued a decision that this country ensures an adequate level of data protection, namely India.

By way of entering into appropriate data transfer agreements based on Standard Contractual Clauses (2010/87/EU and/or 2004/915/EC) as referred to in Art. 46(5) GDPR as well as under UK GDPR or other adequate means, which are accessible by sending an email request to dpo@techmahindra.com, we have established that all other recipients located outside the EEA will provide an adequate level of data protection for the Personal Information and that appropriate technical and organizational security measures are in place to protect Personal Information against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing. Any onward transfer (including to our affiliates outside the EEA and UK) is subject to appropriate onward transfer requirements as required by applicable law.

11.0 Your rights

Subject to the conditions set out under the relevant applicable laws, you may have the following rights:

11.1 The right of access

You may have the right to obtain from us confirmation as to whether or not Personal Information concerning you is being processed, and, where that is the case, to request access to the Personal Information. The access information includes – inter alia – the purposes of the processing, the categories of Personal Information concerned, and the recipients or categories of recipients to whom the Personal Information have been or will be disclosed. You have the right to obtain a copy of the Personal Information undergoing processing. For additional copies requested by you, we may charge a reasonable fee based on administrative costs.

11.2 The right to rectification

You may have the right to ask us to rectify any inaccurate Personal Information concerning you.

11.3 The right to erasure

You may have the right to ask us to erase your Personal Information.

11.4 The right to restrict processing

You may have the right to request the restriction of processing your Personal Information. In this case, the respective data will be marked and may only be processed by us for certain purposes.

11.5 The right to data portability

You may have the right to ask us to provide you your Personal Information which you have provided to us in a structured, commonly used and machine-readable format. You may also have the right to transmit your Personal Information to another entity without hindrance from us.

11.6 The right to object

You may also have a right to object to us processing your Personal Information in certain circumstances. However, such a right to object may not exist in certain situations, for e.g. if the processing of your Personal Information is necessary to take steps prior to entering into a contract or to perform a contract already concluded or if the Personal Information is relevant to a legal dispute then we may not stop processing your Personal Information.

11.7 The right to complain

You may also have the right to lodge a complaint with the competent supervisory authority appointed under applicable law, or if you are an EU resident, the member state of your habitual residence for the alleged breach.

11.8 Enforcement of Data Subject Rights

For any data processing related questions, comments, concerns or complaints or in case You wish to exercise any of your data privacy related rights. You may write to: dpo@techmahindra.com.

12.0 Changes

We reserve to right to change, modify or withdraw access to this Site, or the content of these pages at any time. We recommend you regularly review this Policy.

13. Definitions

S.no	Term	Definition
1	Data Subject or You	A data subject who is the subject of personal and sensitive personal data.
2	PII or Personal Information	<p>PII is any information about an individual (the data subject) which can</p> <ul style="list-style-type: none"> • any information that can be used to distinguish or trace an individual identity. • any other information that is linked or linkable to an individual <p>Examples included but not limited to: Name, Address, Date of birth etc.</p>
3	SPI or Sensitive Personal Information	<p>Sensitive personal data means personal data consisting of information but not limited to the following attributes of the data subject:</p> <ul style="list-style-type: none"> • password; • financial information such as bank account or credit card or debit card or other payment instrument details. • physical, physiological and mental health condition. • sexual orientation. • medical records and history; • genetic or biometric information; • racial and ethical origin; • political opinions; • religious or philosophical beliefs; • trade union membership; • any detail relating to the above clauses as provided to body corporate for providing service; and • any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise: <p>Provided that, any information that is freely available or accessible in 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 data or information for the purposes of these rules.</p>
4	Data Protection and security	Anyone collecting personal and customer information must fairly and lawfully process it, process it only for limited, specifically stated purposes, use the information in a way that is adequate, relevant and not excessive, use the information accurately, keep the information on file no longer than absolutely necessary, process the information in accordance with your legal rights, keep the information secure and never transfer the information outside the country without adequate protection

