

TATA SONS PRIVATE LIMITED

PRIVACY STATEMENT

Your privacy is important to us. Tata Sons Private Limited (“**Tata Sons**” or “**we**”) takes the privacy of your information seriously. This privacy statement explains what personal data we collect from you, through our interactions with you on this website, and how we use that data.

This privacy statement applies to the internal websites:

- Group Innovation Management Systems (“GIMS”)
- Tata InnoVista (DIYRR)
- Tata Ideas
- Tata Ideas Plus

Permitted visitors may access these websites via GIMS or directly. Regardless of the means of access, this privacy policy shall apply to any visitor to these websites. Please note that these websites may include links to websites of third parties whose privacy practices differ from those of Tata Sons. If you provide personal data to any of those websites, then your data would be governed by the privacy statements of the respective third parties.

1. Definitions

In this privacy policy, the following definitions are used:

Data	As defined under Data Protection Laws and includes the information that you submit to Tata Sons via the Portal, and information which is accessed by Tata Sons pursuant to your visit to the Portal.
Cookies	a small file placed on your computer by this Portal when you either visit, or use certain features of, the Portal. A cookie generally allows the website to “remember” your actions or preference for a certain period.
Data Protection Laws	any applicable laws for the time being in force relating to the processing of Data
Portal	the portal/website that you are currently using, GIMS, which includes Tata Ideas, Tata InnoVista and Tata IdeasPlus

Tata Sons or us	Tata Sons Private Limited, a company incorporated in India whose registered office is at Bombay House, 24 Homi Mody Street, Mumbai, India, 400001
Tata Consultancy Services	A Tata Group Company, incorporated in India whose registered office is at 9th Floor, Nirmal Building, Nariman Point, Mumbai - 400021 Maharashtra - India
User or you	the natural person who accesses the Portal

2. Scope

Tata Sons collects data to operate this Portal. You provide some of this data directly, such as when you register on the Portal. No sensitive personal information is collected without your consent, apart from any information or data voluntarily submitted by you including the data provided while contacting us through the website, answering surveys and polls, entering contests and similar promotions and signing up for updates. Such voluntary information/Data shared by you shall deemed to be consented to be shared within the Portal.

Tata Sons reserves the right to share the Data for contest and promotion purposes with its Group companies. In the process of sharing the Data, Tata Sons has no liability or commercial interest in the same.

You can visit the Portal and make choices about our collection and use of your personal data. For instance, you may want to access, edit or remove the personal information in the Portal or close your account. When you are asked to provide personal data, you may choose to not provide the information. However, if you do not provide the personal data which is mandatory to register you on the Portal, then you may not be able to access all sections of the Portal.

3. Data Collected

We may collect information or pieces of information that could allow you to be identified, including:

- a. Personal data / information: We collect first and last name, email address, employer, phone number, gender (optional), age (optional), IP Address and similar such data; and
- b. Cookies, IP address and geo-location: These details are usually captured by the browser automatically when you visit our Portal.

4. How we Collect Data

We collect Data in the following ways:

- a. data is given to us by you; and
- b. data is collected automatically pursuant to your visit to the Portal.

Tata Sons may collect your Data in several ways via the Portal. For instance:

- a. when you contact us (through any form, e-mail address, hyperlink or social media address posted therein);
- b. when you enter a contest, competition or promotion;
- c. when you elect to receive any communications (including any newsletter, promotional offers) from us;
- d. from the information gathered by your visit to our webpages;
- e. information provided by you/your team member.

Other users registered on this Portal may be able to see your personal details (name, email, company, phone) when you participate in competitions, contests, projects and quizzes. Registered users may reach out to you with queries on these matters.

5. Data that is Collected Automatically

- a. We automatically collect some information about your visit to the Portal. This information helps us to make improvements to our Portal content and navigation and includes your IP address and the way you use and interact with its content.
- b. Our web servers or affiliates who provide analytics and performance enhancement services collect IP address, operating system details, browsing details, device details and language settings. This information is aggregated to measure the number of visits, average time spent on the site, pages viewed and similar information. Tata Sons uses this information to measure the site usage, improve content and to ensure safety and security, as well enhance performance of the Portal.
- c. We may collect your Data automatically via Cookies, in line with the cookie settings on your browser. For more information about Cookies, please see the section below, titled “Cookies”.

6. Our Use of Data

Any or all the Data may be required by us from time to time to work on the experience when using the Portal. Specifically, Data may be used by us for the following reasons:

- a. improvement of our products or services, as well as of our group entities;
- b. transmission by email or any other form of communication of marketing materials (related to Group Innovation) to you;
- c. contact for survey or feedback which may be done using email;
- d. to enable our group entities to reach out to you in relation to their Innovation related programmes managed by them;
- e. to process your requests (such as replying to your queries); and

We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. Tata Sons may use your information for internal business purposes, such as analysing and

managing its programs. Your information collected from the portal may be combined with other information collected by us via other online or offline sources, and other information that is available in the public domain. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

7. Who we share Data with

We may share your personal Data with:

- a. Tata Sons-controlled affiliates and subsidiaries and other entities within the Tata group of companies, to assist them to reach out to you in relation to their Innovation programs or campaigns (including marketing and sales) and to process your query / requests;
- b. our employees, vendors, agents and professional advisors working on our behalf for the purposes described in this policy statement; and
- c. service-providers who assist in protecting and securing our systems and provide services to us which require the processing of personal data, such as to host your information or to process your information for data profiling and user analysis.

We do not share other personal Data collected from the Portal with other third parties unless:

- (a) You request or authorize us to do so;
- (b) We need to comply with applicable law or respond to valid legal process; or
- (c) We need to operate and maintain the security of this website, including to prevent or stop an attack on our computer systems or networks.

8. Keeping Data secure

Tata Sons is committed to protecting the security of your Data. We use a variety of security technologies and procedures to help protect your Data from unauthorized access, use or disclosure. We use technical and organisational measures to safeguard your Data and we take full caution from our end to store your Data on secure servers. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via e-mail on innovationsupport@tata.com.

9. Retention of Personal Data

Tata Sons retains personal Data (such as name, contact details, etc.) for as long as necessary to provide the access to and use of the Portal, or for other essential purposes.

Even if we delete/remove/de-activate your personal Data, it may persist on backup or archival media for audit, legal, tax or regulatory purposes.

10. Your Rights

When we process Data about you, we do so with your consent and/or as necessary to provide the Portal you use, operate our business, meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfil other legitimate interests of Tata Sons as described in this privacy statement.

Below, you will find additional privacy information that you may find important. Tata Sons adheres to applicable data protection laws including the following rights in relation to your Data:

- a. **Right to access** - the right to request
 - (i) copies of the information we hold about you at any time, or
 - (ii) that we modify, update such information.

If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is manifestly unfounded or excessive. Tata Sons reserves the right to refuse any such request without providing an explanation.

- b. **Right to correct** - the right to have your personal Data rectified if it is inaccurate or incomplete.
- c. **Right to erase** - the right to delete/remove/de-activate your personal Data from our systems
- d. **Right to restrict use** - the right to limit the way in which we can use your personal data
- e. **Right to sharing your Data** - the right to request that we move, copy, or share your Data with other Tata companies.
- f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.

For information about managing your personal Data, email subscriptions and promotional communications, please submit a request to us by sending an email on innovationsupport@tata.com.

It is important that the personal Data we hold about you is accurate and current. Please keep us informed if your personal Data changes during the period for which we hold it.

11. Links to other websites

This Portal may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites.

12. Cookies

This Portal may place and access certain Cookies on your computer. Tata Sons uses Cookies to improve your experience of using the Portal.

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Portal more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about

adjusting your privacy settings.

13. General

If any court or competent authority finds that any particular provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted. The validity and enforceability of the other provisions of this privacy policy shall remain unaffected.

14. Changes to this Privacy Statement

Tata Sons reserves the right to change this privacy statement as it may deem necessary, from time to time, or as may be required by law. Any changes will be immediately posted on the Portal and you are deemed to have accepted the terms of the privacy statement on your first use of the Portal following the alterations.

For any grievances or support, you may contact Tata Sons through innovationsupport@tata.com.