

Data Privacy Policy

ACC Limited is committed to respecting the privacy of every person who shares information with ACC Limited. Your privacy is important to us and we strive to take reasonable care and protect the information we receive from you. Any reference to “ACC Limited” or “us” hereunder shall mean ACC Limited, and unless repugnant to the context or meaning hereof, includes its affiliates, successors and assigns.

This Data Privacy Policy (“**Privacy Policy**”) is applicable to employees, who disclose Personal Information (defined below) to ACC Limited.

The purpose of this Privacy Policy, as amended from time to time, is to give you an understanding on how we intend to collect, receive, possess, store, transfer, handle, deal with and use information you provide to us.

By executing an employment agreement or any other agreement with ACC Limited and/ or executing a consent letter provided by ACC Limited, you have consented/ hereby consent to the collection, storage, usage, disclosure, processing and transfer of your Personal Information that you provide to us for the purposes as set out in this Privacy Policy.

The Personal Information is provided by you after thoroughly reading, understanding and apprising yourself of the Privacy Policy. You have the option not to provide us your Personal Information sought to be collected if you do not agree with this Privacy Policy or even otherwise. Further, you have an option to withdraw your consent given earlier, provided such withdrawal of consent is given to us in writing. If you opt not to provide us Personal Information or withdraw consent previously provided at any point in time, we may not be able to fulfill the Intended Purposes (as defined below) and accordingly we may be required to terminate our association with you forthwith and as such you acknowledge that such a termination shall amount to a “termination for cause”.

What information does ACC Limited collect?

We may collect various kinds of personal and sensitive information from you including but not limited to your:

- (i) Trade union membership;
- (ii) Religious or philosophical beliefs;
- (iii) Name, contact details, details of past employment (where relevant);
- (iv) Various financial details such as the name of your bank name, bank account details, credit card information, debit card information;
- (v) Your passwords;
- (vi) Your physical, physiological and mental health condition;
- (vii) Your medical records and history;
- (viii) Offences, security measures or criminal convictions; and
- (ix) Your biometric information.

(Collectively “**Personal Information**”)

Usage of Personal Information

We may collect, use, receive, possess, store, disclose, process and transfer your Personal Information for various purposes including but not limited to the following (“**Intended Purposes**”):

- To enable the functioning of ACC Limited’s business;
- In connection with a variety of purposes relating to your employment or engagement by, including, but not limited to, general HR administration; organization planning and management; background checks; third party due diligence; immigration; recruitment; remuneration; entitlements; benefits; incentives; leave; payroll; pensions; severance; retirement; accounts and

expenses; performance management; appraisals; promotion; surveys; compliance with company policies, Code of Conduct and internal regulations; sickness; health and safety data; attendance; workers' compensation issues; relocation; employee transfers; secondments; travel (including visa requirements); insurance; business mergers; business acquisitions; business transfers; due diligence; audits; legal, judicial, governmental and regulatory compliance; tax administration and compliance; company events; mentoring; counseling; complaints; employee relations; misconduct; monitoring; investigations; security; collection of evidence; document retention requirements; overseas affiliates' compliance with foreign laws and cooperation with overseas regulators; disciplinary action; termination and post-termination matters; outplacement services; references; assistance in case of emergency; administration of global employee training and e-learning programs; recruitment (including enabling a global talent pool within the Group and administration of the succession planning); accounting for and protecting assets assigned to employees; internal communication compliance with legal obligations and other purposes related to or connected with the above;

- To insurance providers;
- To IT services providers;
- To transfer information about you if we are acquired by or merged with another company;
- To administer or otherwise carry out our obligations in relation to any agreement you have with us;
- To respond to summons, court orders, or legal process, to establish or exercise our legal rights or defend against legal claims or to make disclosure to regulatory agencies as may be required;
- To facilitate or otherwise carry out the negotiation and execution of contracts in relation to mergers or acquisitions or sale of assets of ACC Limited; and
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of the law or as otherwise required by law.

You consent that the collection, usage, storage, disclosure, processing and transfer of any Personal Information or any other information as disclosed under this Privacy Policy shall not cause any loss to you if the same is used for the Intended Purposes.

Sharing and transferring of Personal Information

We may need to share your Personal Information with our group companies within and outside India, business associates and/ or third parties within and outside India in connection with the Intended Purposes set out above. Such third party may review, process, transfer, and use the information in their business dealings with us and more specifically when dealing with you or matters relating to you in the course of your employment with us.

We may also engage a third party to process the Personal Information on our behalf (including but not limited to collecting, recording, organizing, storing, adapting or altering, retrieving, consulting, using and disclosing). Where we utilize such third party services to collect information on our behalf, details of the said person shall be included in this policy.

You authorize us to exchange, disclose, transfer, share, part with or publish all Personal Information and/ or any information provided by you, within India and/ or to any other country across the world (including in countries where the data protection standards vary from the standards applicable to us). We will ensure adequate data protection standards.

Security

The security of your Personal Information is important to us. We have adopted reasonable security practices and procedures to ensure that your Personal Information is protected from unauthorized third party access. In case you wish to know more details about the adopted reasonable security practices and procedures, you may contact Mr. Shubhojit Ghosh, Manager - Legal. While we will endeavour to take all reasonable and appropriate steps to keep secure any information which we hold about you and prevent unauthorized access, you acknowledge that we cannot provide any absolute assurance regarding the security of your Personal Information. To the fullest extent permissible by applicable law, we disclaim any liability in relation to any breach of security or loss or disclosure of information in relation to your Personal Information.

Access

If you need to access, update, correct or review or withdraw your Personal Information, you may contact Mr. Shubhojit Ghosh, Manager - Legal. You agree that you shall not abuse this right by making requesting access at unreasonable intervals or repetitively and systematically. Further, no access shall be provided if not permitted by law or if such access shall seriously harm our interests, provided that such denial of access does not prejudice your fundamental rights and freedoms.

Data Retention

It is ACC Limited's policy to retain Personal Data of both current and former employees only for as long as ACC Limited believes it to be necessary for the Intended Purposes for which the data was collected, subject to any legal requirements for the data to be retained for longer periods of time.

Changes to this Privacy Policy

We reserve the right to revise and update this Privacy Policy at any time. Any such revisions will be effective on the date of posting to the intranet, and will apply to all information collected by us both prior to and following the effective date. Your use of the intranet following any such revisions will be deemed your acceptance of such revisions. You should periodically visit this page to review the current policies with regard to Personal Information.

Grievance

We have nominated Mr. Shubhojit Ghosh, Manager - Legal as the Data Privacy Grievance Officer of ACC Limited. You may approach the Grievance Officer if you have any grievance, questions or concerns with respect to the processing and use or withdrawal of your Personal Information. You may contact this officer at shubhojit.ghosh@acclimited.com.

Updated on July 1, 2019

Document Control

Contribution	Name	Organisation Role
Prepared by	Mr. Shubhojit Ghosh	Manager - Legal
Reviewed by	Mr. Rajiv Choubey	Director – Legal
Approved by	Mr. Neeraj Akhoury	Managing Director & CEO

Version Control

Version 1.0 dated August 19, 2016

<u>Version</u>	<u>Date</u>	<u>Modified by</u>	<u>Change Description</u>
1.1	July 1, 2019	Mr. Shubhojit Ghosh	1. Revised definition of "Personal Information". 2. Revised definition of "Intended Purposes". 3. Inserted details of Data Protection Grievance Officer.