

Godrej and Boyce Manufacturing Company Limited

General Data Protection Regulation (GDPR)

Data Privacy

Personal Data Protection and Privacy Policy

Original Effective Date: August 5, 2019

[Last Updated: August 5, 2019]

Table of Contents

| | | |
|-----|------------------------|----|
| 2. | PURPOSE..... | 3 |
| 3. | SCOPE..... | 3 |
| 4. | RESPONSIBILITY..... | 3 |
| 5. | OBJECTIVE..... | 4 |
| 6. | POLICY COMPLIANCE..... | 4 |
| 7. | POLICY STATEMENT..... | 4 |
| 8. | GLOSSARY | 9 |
| 9. | REFERENCES | 10 |
| 10. | ANNEXURES | 10 |

1. INTRODUCTION

Godrej and Boyce Manufacturing Company Limited (“**Godrej**”) is committed to ensure fair and secure processing of any information relating to relevant employees, customers and vendors in accordance to the European Union’s (“**EU**”) data privacy law, industry leading practices and recognized international standards on privacy and the protection of personal data.

(For a list of EU countries, please refer to Annexure A)

2. PURPOSE

The purpose of this policy is to articulate Godrej’s position on privacy and protection of all EU individual’s personal data including sensitive personal data (also referred to as personal information and sensitive personal information /special categories of personal data) during the course of its business operations, and therefore to:

- provide management direction and support for privacy and protection of personal data;
- set the requirements and expectations for data privacy;
- set out the roles and responsibilities that all stakeholders (e.g. employees, vendors, business partners) have towards privacy and protection of personal data;
- ensure Privacy by Design for all new and existing business activities, projects, programmes, businesses, processes, technologies, products or research; and
- guide the implementation of appropriate policies, standards, processes, procedures and controls that are necessary to uphold the confidentiality, integrity and availability of all personal data resources within Godrej, and specifically those that pertain to the EU. Godrej will create awareness about this policy and shall use its best endeavours to influence compliance of the same among all dealers, vendors, suppliers, agents, intermediaries, contractors & sub-contractors, consultants, Joint Venture partners and other business associates of Godrej.

3. SCOPE

This policy is applicable to Godrej, including its subsidiaries, operating units and support functions. The policy will be applicable to all employees (full-time, part-time and those on contractual assignments), workers, contractors/vendors, customers, visitors and business partners (hereinafter referred to as “**User**”) regardless of geographic locations, who either receive or have access to EU individual’s personal data collected or processed by or on behalf of Godrej, or who provide personal data to Godrej as a result of their relationship with Godrej. It applies to the processing of all personal data records in any format or structure, either electronic or physical. This policy is at all times subject to the requirements of applicable laws.

4. RESPONSIBILITY

- The Personal Data Protection and Privacy Policy has been issued under the authority, ownership and governance of the Privacy Officer.
- The organization has nominated a Privacy Officer for the implementation and maintenance of the Policy.
- The Privacy Officer is responsible for reviewing/ updating and monitoring compliance to the Personal Data Protection and Privacy policy.
- Business and Support Functions, under the supervision of the Privacy Officer, shall be responsible for implementing this policy's requirements.
- All Users are expected to comply with this policy.

5. OBJECTIVE

The specific objectives of this Personal Data Protection and Privacy policy are to:

- ensure that Godrej's information processing systems comply with relevant laws and regulations, industry leading practices and recognized international standards on privacy and protection of personal data;
- ensure that all of the personal data processed or stored within Godrej's custody including information which has been transferred to a third party for processing is adequately protected against threats to maintain its security;
- preserve integrity and quality of all personal data for which Godrej is responsible;
- ensure that employees of Godrej are fully aware of the contractual, statutory or regulatory implications of any privacy breaches;
- limit the use of personal data to identified business purposes for which it is collected;
- create an awareness of privacy requirements as an integral part of the day to day operations of every employee and ensure that they understand the importance of privacy practices and their responsibilities for maintaining privacy; and
- make all the stakeholders aware about, the processes that need to be followed for collection, lawful usage, disclosure/ transfer, retention, archival and disposal of personal data.

6. POLICY COMPLIANCE

- Failure to comply with this policy shall result in disciplinary action, and possibly termination of employment.
- Respective Business Unit Representatives (*as set out in Annexure B*), and Privacy Officer(s) shall ensure adherence to this policy and shall be responsible for appropriate remedial action.
- Any exceptions to this policy need to be handled by informing the Privacy Officer by providing a valid business justification, risk acceptance from Business Unit Representatives and approvals from the Privacy Officer.

7. POLICY STATEMENTS

MANAGEMENT

- 7.1.1. The Personal Data Protection and Privacy Policy and procedures shall be approved by the Privacy Officer and published for general consumption by all Godrej entities in scope.

- 7.1.2. The Personal Data Protection and Privacy Policy and related procedures shall be communicated to the intended audience through use of relevant, accessible and understandable modes of communication.
- 7.1.3. Privacy organization structure shall be established with clearly defined roles and responsibilities to support establishing, implementing, operating, monitoring, maintaining, reviewing and improving the data privacy culture across the organization. In case more details regarding the Privacy Organization Structure are required, please get in touch with the Privacy Officer.
- 7.1.4. Personal data should be adequately protected and thus be classified as 'Confidential' as per the Godrej's Acceptable Usage Policy.
- 7.1.5. Changes or updates to the Personal Data Protection and Privacy Policy shall be communicated to relevant stakeholders through use of relevant, accessible and understandable modes of communication when the changes become effective.
- 7.1.6. Procedures shall be established for performing mandatory registration, wherever applicable, with regulatory bodies. (e.g. Registration of Data Protection Officer (DPO) with Supervising Authority)
- 7.1.7. The Privacy Officer shall ensure that business functions maintain, review and update Personal data inventory (also known as record of processing activities) annually or if any major change in existing system and/or process or introduction of new systems and/or process. (Refer Records of Processing Activities Inventory – Data Mapping Template)
- 7.1.8. Privacy Impact Assessment (also known as Data Protection Impact Assessment) shall be carried out biannually or if any major change in existing system and/or process or introduction of new systems and/or process to ensure risks to personal data are identified and managed. (Refer Data Protection Impact Assessment Procedure)
- 7.1.9. The Privacy Officer shall review and update the privacy policy and procedures every two years or if there are any changes in the applicable laws, regulations, or standards and such updates shall be notified to the intended audience through use of relevant, accessible and understandable modes of communication.

NOTICE

- 7.1.10. Appropriate data privacy notice shall be provided to relevant data subjects at the time or before collecting their personal data including sensitive personal data.
- 7.1.11. The data privacy notice shall be clear and conspicuous and shall cover an objective description of the data privacy practices adopted by the organization.
- 7.1.12. Data subjects shall be provided a privacy notice in case any new purpose is identified for processing personal data or if there is any change in the existing privacy notice.
- 7.1.13. Some of Godrej's premises and sites use CCTV systems to monitor exterior and interior premises 24 hours a day for security reasons. Godrej shall take reasonable efforts to alert the individual that the area is under electronic surveillance.

CHOICE AND CONSENT

- 7.1.14. Implicit or explicit consent shall be obtained from data subjects at the time of collection of personal data or as soon as practical thereafter.
- 7.1.14.1. Explicit consent shall be obtained from data subjects for the collection, use, disclosure and transfer of sensitive personal data, unless a law or regulation specifically requires or allows otherwise.
- 7.1.14.2. A record shall be maintained of explicit consent obtained from data subjects.
- 7.1.15. Consent shall be obtained from data subjects before their personal data is used for purposes not previously identified or communicated to the data subject.
- 7.1.16. Consent shall be obtained from data subjects before their personal data is used for direct marketing, automated decision making or profiling.
- 7.1.17. Appropriate consent shall be obtained from data subjects before their personal data is transferred to or from Godrej's information processing systems.
- 7.1.18. Data subjects shall be informed of the consequences of refusing to provide personal data or of denying or withdrawing consent to use personal data for purposes identified in the notice.

COLLECTION OF PERSONAL DATA

- 7.1.19. Godrej shall identify and document what conditions for processing personal data of data subjects is relied upon e.g. (Consent of data subjects, legitimate interests, compliance to legal obligations, processing of contracts, protect vital interest of data subject when data subject is incapable to provide consent, performance of a task carried out in public interest).

DATA MINIMISATION

- 7.1.20. Godrej shall only process Personal data that is adequate, relevant, and not excessive for the identified purposes.
- 7.1.21. Godrej shall not process personal data more than is necessary (e.g. strip out irrelevant data fields before disclosing information to a third party).
- 7.1.22. The collection of personal data shall be limited to the minimum requirement for appropriate and lawful business purposes.
- 7.1.23. Methods of collecting personal data shall be reviewed by management to ensure that personal data is obtained:
 - ▶ fairly, without intimidation or deception; and
 - ▶ lawfully, adhering to laws and regulations relating to the collection of personal data.
- 7.1.24. Management shall confirm that third parties from whom personal data is collected:
 - ▶ use fair and lawful information collection methods; and
 - ▶ comply with this policy and other contractual obligations with respect to the collection, use and transfer of personal data on behalf of Godrej.
- 7.1.25. Data subjects shall be notified if additional information is developed or acquired about them.

- 7.1.26. Godrej shall maintain an inventory of personal data collected and processed within all business functions and processes.

USE, RETENTION AND DISPOSAL

- 7.1.27. Godrej shall develop guidelines and procedures with respect to the retention and disposal of personal data. These guidelines and procedures shall include minimum and maximum retention periods. (Refer Personal Data Retention Guideline)
- 7.1.28. Godrej will retain personal and sensitive data only for as long as necessary for legal or regulatory reasons or for legitimate business purposes.
- 7.1.29. Godrej shall not use or disclose personal or sensitive personal data for purposes other than those for which it was collected, except with the consent of the user or as required by law.
- 7.1.30. Godrej shall make clear justifications and basis for retention periods and document any applicable justification for retaining personal data for a longer period than the stated minimum retention period. (Refer Records of Processing Activities Inventory – Data Mapping Template)
- 7.1.31. Upon completion of identified lawful business purposes or withdrawal of consent, Godrej shall either securely erase or anonymize the data subjects' personal data from Godrej information processing systems and files.
- 7.1.32. Godrej shall dispose/ erase/destroy personal data from equipment or devices used for storing personal data securely as per Godrej's information security practices.

ACCESS AND OPENNESS

- 7.1.33. Processes shall be established for data subjects to:
- ▶ request access to their personal data as prescribed by law;
 - ▶ correct or update their personal data; and
 - ▶ withdraw consent for the processing of their personal data.
- 7.1.34. The identity of data subjects requesting access to their personal data, or the identity of persons authorized by the data subject to access the data subject's personal data, shall be reasonably verified before providing access to such information.
- 7.1.35. A response shall be given to data subjects who have requested access to their personal data. This response will be in an accessible form, within a defined period from receipt of complaint/ request as prescribed by law.
- 7.1.36. Data subjects shall be notified, in writing, the reason for any denial of requests for access to their personal data to the extent required by applicable law.

(Refer Subject Access Request Procedure)

DISCLOSURE TO THIRD PARTIES AND CROSS BORDER TRANSFERS

- 7.1.37. Personal data shall be disclosed to data processor such as (third party, vendor, and contractor) only for identified lawful business purposes and after obtaining appropriate consent from the data subjects, unless a law or regulation allows or requires otherwise.
- 7.1.38. Where reasonably possible, management shall ensure that data processor collecting, storing or processing personal data on behalf of Godrej have:

- 7.1.38.1. signed agreements to protect personal data consistent with Godrej's Personal Data Protection and Privacy policy and information security practices or implemented measures as prescribed by law;
- 7.1.38.2. signed non-disclosure agreements or confidentiality agreements which includes privacy clauses in the contract; and
- 7.1.38.3. established procedures to meet the terms of their agreement with Godrej to protect personal data.
- 7.1.39. Personal data may be transferred across geographies from where Godrej operates for storage or processing activities including without limitation:
 - HR administration (for example, staff recruitment);
 - payroll processing for employees working outside the country where they are based;
 - employee relocation;
 - security clearances;
 - visa applications;
 - taxation and registrations for employees working outside the country where they are based;
 - fulfilling Godrej 's legal requirements;
 - fulfilling customer contracts for the provision of Godrej 's services;
 - overseas legal proceedings; and
 - outsourcing Godrej 's business functions.

This will be applicable where any of the following apply:

- 7.1.39.1. The individual has given consent to the transfer of data.
- 7.1.39.2. The transfer is necessary for the performance of a contract between the individual and Godrej, or the implementation of pre-contractual measures taken in response to the individual's request.
- 7.1.39.3. The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between Godrej and a data processor.
- 7.1.39.4. The transfer is necessary or legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.
- 7.1.39.5. The transfer is required by law.
- 7.1.39.6. The transfer is necessary to protect the vital interests of the individual.
- 7.1.39.7. The transfer is made under a data transfer agreement.
- 7.1.39.8. The transfer is otherwise legitimized by applicable law.
- 7.1.40. Remedial action shall be taken in response to misuse or unauthorized disclosure of personal data by a third party collecting, storing or processing personal data on behalf of Godrej.

SAFEGUARDING PERSONAL AND SENSITIVE PERSONAL DATA

- 7.1.41. Godrej shall deploy appropriate physical, organizational and technological safeguards to protect personal data from unauthorized disclosure, use, modification and destruction.

- 7.1.42. Incident response protocols shall be established and maintained in order to deal with incidents concerning personal data or privacy practices.
- 7.1.43. Breaches of this Policy must be reported to Privacy Officer. Godrej shall deal with data privacy breaches in accordance with the Privacy Incident and Data Breach Response guidelines (Refer Privacy Incident and Breach Management Procedure).

QUALITY OF PERSONAL DATA

- 7.1.44. Godrej may perform additional validation procedures to ensure that personal data collected is accurate and complete for the business purposes for which it is to be used.
- 7.1.45. Godrej shall ensure completeness and accuracy of the personal data collected at the time of collection and that the personal data shall be kept up to date and validated on an ongoing basis.

MONITORING AND ENFORCEMENT

- 7.1.46. Monitoring of Godrej 's information processing systems shall be carried out if and to the extent permitted or as required by law and as necessary and justifiable for business purposes. The resulting log files may be used so that instances of attempted misuse and other security events can be detected, and that information is available to support any subsequent investigation. To the extent permitted by law and, where:
- a. breaches of this and other Godrej policies or applicable law are found, action may be taken under the disciplinary procedure.
 - b. The employees are informed that the telephone system used by the Company allows identification of all dialled numbers and received calls.
- 7.1.47. Godrej reserves the right to retrieve the contents of messages, check searches which have been made on the internet, require the immediate return of devices supplied by Godrej and access data stored on such devices for the following purposes (this list is not exhaustive):
- ▶ to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this policy (and employees acknowledge that Godrej can use software to monitor the identity of senders and receivers of emails);
 - ▶ to find lost messages or to retrieve messages lost due to computer failure;
 - ▶ to assist in the investigation of wrongful acts; or
 - ▶ to comply with any legal obligation.
- 7.1.48. If evidence of misuse of Godrej 's IT systems is found, Godrej may undertake a more detailed investigation in accordance with Godrej 's disciplinary procedures, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the disciplinary procedure. If necessary, such information may be handed to the competent authorities in connection with a criminal investigation. Investigations and disclosure of information to the relevant authorities shall be carried out only to the extent permitted by law.
- 7.1.49. The effectiveness and efficiency of this policy will be monitored and reviewed periodically through privacy audits or management reviews.

- 7.1.50. A record shall be maintained of non-compliances identified in the privacy audits and reviews. Corrective and disciplinary measures shall be initiated and tracked to closure by Privacy Officer and guided by Privacy Council.
- 7.1.51. Periodic and refresher training and awareness session shall be conducted for all employees and vendors / contractors who have access to and process personal data on behalf of Godrej.
- 7.1.52. Records related to training and awareness sessions shall be maintained.
- 7.1.53. Godrej shall institute procedures for receiving and responding to complaints/ inquiries from customer/ employee/ vendor relating to the handling of personal and sensitive personal data.
- 7.1.54. Each complaint regarding privacy practices registered by data subjects shall be validated, its responses shall be documented and communicated to the individual.
- 7.1.55. Any conflicts or disagreements relating to the requirements under this policy or associated privacy practices shall be referred to the Privacy Officer for resolution.

8. GLOSSARY

| Term | Definition |
|----------------------|--|
| Anonymize | Processing of personal data in such a manner that a natural person cannot be identified on the basis of output processing of data or information |
| Data subject | A living individual (<i>specifically a citizen of EU</i>) about whom personal data is processed by or on behalf of Godrej |
| Data Processor | An entity such as all external parties – including without limitation contractors, vendors, service providers that processes data on behalf of an organisation. |
| Information security | Preservation of confidentiality, integrity and availability of information; in addition, other properties, such as authenticity, accountability, non-repudiation, and reliability can also be involved. |
| Godrej | Godrej / its Subsidiaries / its affiliates, its directors, employees (<i>excluding the User/affirming employee in this context</i>), assigns and successors. |
| Profiling | Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict: <ul style="list-style-type: none"> • aspects concerning that natural person's performance at work • economic situation • health • personal preferences • interests • reliability • behaviour • location or movements. |

| | |
|---|---|
| Processing | <p>To Process or Processing, in relation to information or data, means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, irrespective of the equipment and procedures used, including:</p> <ul style="list-style-type: none"> • collection, storage and archiving of the information or data • organization, adaptation or alteration of the information or data • retrieval, consultation or use of the information or data • Disclosure of the information or data, dissemination or otherwise making available • communication of the information or data • erasure or destruction of the information or data. |
| Personal and Sensitive personal data or Special categories of personal data | <p>Any type of information related to identified or identifiable individuals, or information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.</p> <p>Definition of sensitive Personal data as per applicable privacy law as stated below:</p> <p>EU General Data Protection Regulation (GDPR) Sensitive personal data means personal data consisting of information as to:</p> <ol style="list-style-type: none"> 1) the racial or ethnic origin of the data subject, 2) his political opinions, 3) his religious beliefs or other beliefs of a similar nature, 4) whether he is a member of a trade union, 5) genetic and biometric data of a data subject 6) his physical or mental health or condition, 7) His sexual life or sexual orientation. |

9. REFERENCES

Incident and Breach Management Procedure
Subject Access Request Procedure
Data Protection Impact Assessment (DPIA) Procedure
Personal Data Retention Guideline

10. ANNEXURES

Annexure A – List of EU Member States
Annexure B - Contact Details of all BU Representatives

If you have any questions about this Policy, you may contact the Privacy Officer at gdpr@godrej.com. If the questions are specific in nature to your Business Unit (BU), you may refer them to the BU Representative of your division while ensuring the Privacy Officer is copied in on all such correspondence.

ANNEXURE A - LIST OF EU MEMBER STATES (As on 5 August 2019)

- Austria
- Belgium
- Bulgaria
- Croatia
- Republic of Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom

ANNEXURE B - CONTACT DETAILS OF BU REPRESENTATIVES FOR PRIVACY

| Business / Department | Email ID of BU Representative for Privacy |
|---|--|
| Godrej Appliances | Rizwana Moinuddin (9833374060 / 022- 67966139) (rizwana@godrej.com) |
| Godrej Electricals & Electronics | Sanjay P Sarma (9619516276 / 022- 67962241) (spsarma@godrej.com) |
| Godrej Interio | Berzis Meherhomji (022- 67963441) (berzis@godrej.com) |
| Godrej Security Solutions | Priyesh Deb (9986569943) (priyesh@godrej.com) |
| Godrej Material Handling | Mehernosh Chhapgar (9833504476 / 022- 67964635) (mkc@godrej.com) |
| Godrej Aerospace | Paurush Bhesania (9820131030) (ppb@godrej.com) |
| Godrej Prima | Neeraj Kumar (9920403671 / 67963671) (kumar@godrej.com) |
| Godrej Tooling | Shoyi John (98102 84422)(shoyi@godrej.com) |
| Lawkim Motors Group | Vinay Salastekar (9820505411) (vvs@godrej.com) |
| Corporate Finance | Sarosh Doctor (9820016880 / 022-67965158) (smdoctor@godrej.com) |
| Corporate Procurement & EXIM Services | Narendra Rupareliya (9819897943 / 022- 67963293) (ngr@godrej.com) |
| Corporate HR | Sunil Dube (022- 67964137) (sunil@godrej.com) |
| Corporate Commercial | Mohan Nair (9820815774 / 011- 67965094) (mnn@godrej.com) |
| Godrej Construction | Please contact the Privacy Officer |
| Godrej Precision Systems | Please contact the Privacy Officer |
| Godrej Process Equipment | Chitra Iyer (9833069358 / 022-67966541) (chitra@godrej.com) |
| Godrej Precision Engineering | Please contact the Privacy Officer |
| Godrej Locking Solutions and Systems | Please contact the Privacy Officer |
| Godrej Storage Solutions | Please contact the Privacy Officer |
| Godrej Precision Systems | Please contact the Privacy Officer |
| Corporate Audit | Please contact the Privacy Officer |
| Legal – Contracts, IP, Land & Litigation | Please contact the Privacy Officer |
| Innovation and Design Centre | Please contact the Privacy Officer |