

PRIVACY POLICY

In the event of any discrepancy or conflict between this English version and any other subsequently translated version, if so done, this English version will prevail over any translated version.

1. **This Privacy Policy (“Policy”)** aims to give You (defined below) information on how Birla Tyres Limited collects and processes Your (defined below) personal data or information through Your use of this website. Please ensure that this Policy, is perused by You before availing any services from Us (defined below).
2. This Policy shall be updated from time to time and therefore in order to stay abreast with the purpose for which Your Information (defined below) is collected and processed and how We protect Your privacy, We (defined below) recommend You to please keep reviewing the Policy. **THIS POLICY APPLIES TO PROCESSING OF PERSONAL DATA COLLECTED IN DIGITAL FORM OR ANY NON-DIGITAL FORM WHICH IS DIGITISED SUBSEQUENTLY.**
3. Birla Tyres Limited, a company duly incorporated under the provisions of the Companies Act, 2013, having its registered office at 23A, Netaji Subhas Road, 8th Floor, Suite No. 15, Kolkata, West Bengal, India – 700001 and its manufacturing plant located at [Chhanpur, Balasore, 756056 Baleswar, Odisha] (collectively hereinafter referred as, **“BTL” “Company”, “We,” “Us,” or “Our”**) own and operate the BTL website [<https://www.birlatyre.com>] (hereinafter referred as **“Website”**), and is committed to protect the privacy and security of personal data, belonging to and/or provided by any person who accesses or uses the website (hereinafter referred as **“User” “You” or “Your”**).
4. We value Your privacy and advise You to carefully read this Policy as this Policy describes, (i) the types of Personal Data or Personal Information (“PI”) and Sensitive Personal Data or Information (“SPDI”). It is hereby clarified that, SPDI includes among others, Your password(s), Your financial information(s) such as details of your bank account, credit card, debit card or other payment instrument, and Your Biometric information. We collect, (ii) how We collect the Information, (iii) how We use the collected Information, (iv) how We process and protect the Information We collect, (v) for how long We store it, (vi) with whom We share it, (vii) to whom We transfer it (viii) the rights that individuals can exercise regarding Our use of their Information and (ix) Grievance Redressal. We also describe how You can contact Us about Our privacy practices and to exercise Your rights.
5. It is clarified here that for the purposes of this Policy, PI and SPDI shall hereinafter be collectively referred to as **“Information”**.
6. BTL, being the owner of the website, respects Your privacy, and seeks to comply with all the applicable statutory requirements in India, including the Digital Personal Data Protection Act, 2023; Information Technology Act, 2000; and Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 made thereunder in respect of data collection, processing and transfer.
7. This Policy is incorporated into and subject to Our Terms and Conditions (**“User Terms”**) and shall be read harmoniously and in conjunction with the User Terms. In the event of any conflict

between the User Terms and this Policy, the provisions of the User Terms shall supersede this Policy to the extent of procedural requirements, business practices etc., and subject to the applicable laws. All capitalised terms not defined under this Policy shall have the meaning ascribed to it under the User Terms. The User Terms can be found on [Please insert "User Terms" link]. **THIS POLICY DOES NOT APPLY TO INFORMATION THAT YOU PROVIDE TO, OR THAT IS COLLECTED BY (i) ANY THIRD PARTY THROUGH OUR WEBSITE AND (ii) ANY THIRD PARTY WEBSITES THAT YOU ACCESS OR USE IN CONNECTION WITH THE SERVICES OFFERED THROUGH OUR WEBSITE. THE COMPANY SHALL NOT BE LIABLE FOR AND HAS NO CONTROL OVER THE PRACTICES AND CONTENT OF ANY SUCH THIRD PARTIES.**

8. Our Services

BTL is engaged in the business of tyre manufacturing and offers a comprehensive range of high-quality tyres designed to cater to various vehicles and terrains. Our product portfolio includes Truck Bus Bias Tyres, Off-The-Road Tyres, and Agricultural Tyres

9. Consent

We shall obtain Your consent for the collection, storage, processing, disclosure, transfer and/or dealing with Your PI by way of a notice to You at the time of taking such consent. The said notice, among other things shall cover information regarding what is the personal data which is being requested, the purpose for processing of such data, intimation regarding the right to withdraw the consent, intimation regarding the right to Grievance Redressal, the manner in which You may raise a complaint to the Data Protection Board of India ("**DPBI or Board**"). By clicking on the "**I accept**" button on the landing page individually and separately, once for the User Terms and second time for the Policy or by providing Us Your personal information by any means whatsoever, or by visiting this website, or by providing your personally identifiable information by us, You hereby consent to the collection, storage, processing, disclosure and transfer of Your PI for the purpose specified below, in accordance with the provisions of this Policy and **AGREE TO BE LEGALLY BOUND BY THE SAME. IF YOU DO NOT AGREE TO THE POLICY, PLEASE DO NOT USE OR ACCESS THE WEBSITE.** You also consent that the collection, storage, processing, disclosure and transfer of any Information shall not cause any wrongful loss to You, if it is done in accordance with the provisions of this Policy. **WE SHALL NOT BE LIABLE FOR ANY LOSS THAT MAY HAPPEN TO YOU OR ANY OTHER PERSON PROVIDING US WITH WRONG PI. PLEASE READ THE POLICY CAREFULLY BEFORE USING OR REGISTERING ON THE WEBSITE OR ACCESSING ANY MATERIAL, INFORMATION OR AVAILING ANY SERVICES THROUGH THE WEBSITE. BY CLICKING ON THE "I ACCEPT" BUTTON ON THE LANDING PAGE, YOU ACCEPT THIS POLICY.**

- 10.** Notwithstanding the above, we are entitled to process your personal data or information under the following circumstances: Where the personal data of Data Principals not within the territory of India is processed pursuant to any contract entered into with any person outside the territory of India by Us; Where the processing is necessary for a scheme of compromise or arrangement or merger or amalgamation of two or more companies or a reconstruction by way of demerger or otherwise of a company, or transfer of undertaking of one or more company to another company, or involving division of one or more companies, approved by a court or tribunal or other authority competent to do so by any law for the time being in force.

11. Children Under the Age of 18

Our Site is not intended for children under 18 years of age, and BTL does not knowingly collect or use any Personal Data from children under the age of 18 years of age. No one under 18 years of age may provide any information to Us or on the Site. If We learn We have collected or received Personal Data from a child under 18 years of age, We will delete the information. If You believe We might have any information from or about a child under the age of 18, please contact us at [[●corporate@birlatyre.com](mailto:corporate@birlatyre.com)]

12. Collection of Information

When You access Our services, We may ask You to voluntarily provide Us with certain Information that personally identifies You or could be used to personally identify You. At times, We may collect PI about You manually or through Our website from Contact Us form, Job Application Form, through E-mail, Cookies or through IP address (like a redirect link of Employee Self Service Portal) etc. It shall be further noted that data collected from such forms may be further redirected to multiple departments based on queries received by Us. For instance- Job Application form might get redirected to the Human Resource Department, Contact Us form might get redirected to Sales & Marketing, Customer Service or Technical Department. Further, any Information collected from You will be notified through e-mail. The said collected Information is classified/sub-classified by BTL into various heads based on the nature of the Information of the concerned department, for example the Financial Team receives Transactional Information, the Human Resource Team receives the PI, etc.

13. When interacting with Our Site, certain data is automatically collected from Your device or web browser. Detailed information about these practices is included in the “Cookies Policy”. This data includes:

- 13.1 Device IDs, call state, network access, storage information and
- 13.2 Cookies, IP addresses, referrer headers, data identifying your web browser and version and web beacons and tags
- 13.3 Other types of information that You voluntarily choose to provide Us

14. Types of PI for the purpose of this Policy are as follows:

- 14.1 Contact Information - name, address, contact details like email ID and phone number;
- 14.2 Job Application Information - designation from previous job, years of experience, area of expertise, or any other professional or employment- related information and education information;
- 14.3 Sensitive Data- details pertaining to Pan Card, Aadhar Card, Bank;
- 14.4 Demographic information: age, gender, date of birth;
- 14.5 Tyre and Vehicle: Your vehicle’s make, model, trim, and year, license plate number and state; the Vehicle Identification Number (VIN); your current brand of tyres; and your tyre identification number;
- 14.6 Payment and Transaction Information: including data of products purchased on our Site, third party dealer from whom You purchased Our product, date and time of Your transaction, payment account details, credit card and debit card numbers, expiration date, shipping and billing address;
- 14.7 Account login information- including any information that is required by You to establish a user account, such as username, password and security question and answer;

14.8 Any other information that is collected or generated in the course of availing the services;

Any other Information relating to the above which You may have shared with Us prior to this Policy for availing any of the services. **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 INFORMATION FOR THE PURPOSE OF THIS POLICY.**

15. When You visit Our website, We may collect certain non-personal information such as Your internet protocol address, operating system, browser type, internet service provider, aggregate user data, software and hardware attributes, pages You request, number of click, active seconds or minutes on Our website, frequency of Your visit to Our website, the date and time of Your visit to Our website. **THIS TYPE OF INFORMATION DOES NOT IDENTIFY YOU PERSONALLY.**

16. Data Processing

Your information is collected and processed in accordance with the terms and conditions of this Privacy Policy.

17. How the data is collected

17.1 Manually (subsequently digitised) or through Our website from Contact Us form, Job Application Form, through E-mail, Cookies or through IP address (like a redirect link of Employee Self Service Portal) etc. Same shall be notified through an e-mail.

17.2 Third party organisations such as third-party recruitment agencies (for instance, [Naukri.com](https://www.naukri.com)) in digital or manual form (subsequently digitised by BTL).

17.3 Any Information that You voluntarily choose to provide to Us through the website or email, during registration or interaction with Us on call or chat and other modes of communication;

17.4 During Your usage of the website, We may collect Information based on Your use of Our services.

18. Use of Information

We collect Your Information which is necessary for Our legitimate interests and lawful purpose to monitor on how Our website is used to help us improve the layout and information available on Our website and provide a better service to Our Users, including the following:

- i. to know customer requirement through customer data;
- ii. to know vendors capability through vendor data;
- iii. to know technical skills through employee data;
- iv. to respond to Your inquiries;
- v. to provide You with information about products and services available on the website.
- vi. to personalize Your experience on the website;
- vii. to help You address Your problems incurred on the website including addressing any technical problems;
- viii. for proper administering of the website;
- ix. to conduct internal reviews and data analysis for the website (e.g., to determine the number of visitors to specific pages within the website);
- x. to improve the services, content and advertising on the website;

- xi. to protect the integrity of the website;
- xii. to respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law;
- xiii. to make disclosures as may be required under applicable law.

19. Data Sharing

We may share, disclose and transfer Your Information to such entities (including third party entities) as required to provide services to You, improve Our services, and to provide value added services or other third-party products and services, to the extent permitted by applicable law.

These entities may be located outside India, which You hereby consent to. We require such entities to provide for a higher degree of protection than what is adopted by Us for the personal data of individuals provided by Us to You. We may disclose or transfer Information to Our business affiliates, Partners, Associates, Vendors. In the event of a merger, reorganization, acquisition, joint venture, assignment, spin-off, transfer, asset sale, or sale or disposition of all or any portion of Our business, including in connection with any bankruptcy or similar proceedings, We may transfer any and all Information with Your consent to the relevant third party with the same rights of access and use and, that ensures the same level of data protection that is adhered to by BTL as provided under the relevant rules in India.

20. Notwithstanding the above, We may have to mandatorily also provide the PI, to:

- 20.1 Law Enforcement Agencies: We may disclose Your Information if required to do so by law or when We believe that such disclosure is appropriate to comply with law or in good faith belief that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal process. We may disclose in the interest of prevention, detection, investigation or prosecution of any offence or contravention of any law. We may disclose Information to law enforcement agencies, pursuant to lawful requests for information, and otherwise as required under any law applicable at the given time, both in India and outside India.
- 20.2 Disclosure to Government: In the Interest of sovereignty and integrity of India, security of the State, friendly relations with foreign States, maintenance of public order or preventing incitement to any cognizable offence relating to any of these and the processing by the Central Government of any personal data that such instrumentality may furnish to it, and necessary for research or statistic purposes.

21. Data Retention

We shall not retain Your Information for longer than is required for the purposes for which the Information may lawfully be used (till engagement with BTL). However, We may retain data related to You, if there is a legal obligation to retain the data; if required to comply with any applicable statutory or regulatory retention requirement by law; if We believe it may be necessary to prevent fraud or future abuse; to enable the Company to exercise its legal rights and/or defend against legal claims; or for other legitimate purposes.

We may continue to retain Your data in anonymised form for analytical and research purposes. BTL shall not retain any Information beyond the period necessary to satisfy the purpose for which it is processed and shall delete the Information at the end of the processing.

22. Data Protection

The Information collected by Us, is in compliance with the laws and the same is collected with proper authorisation. We keep an internal control/ check with regards to providing access of Information through an Authorisation matrix.

23. Biometric Information

The information collected by BTL through its Biometric means, is solely for the purpose of collecting attendance and for the authorisation of its employees. The said Biometric device is available in its registered head office as well as its registered manufacturing plant. We abide to the statutory requirements for collection of such Biometric Information and obtains prior consent from the employees before collecting such Information collected through the Biometric device. Further, such Information collected through the Biometric device, by Us is not retained for longer than the period for which purpose it has been collected for.

24. Withdrawal of Consent

You may choose to withdraw Your consent provided hereinunder at any point in time. Such withdrawal of the consent must be sent in writing to [corporate@birlatyre.com]. In case You do not provide your consent or later withdraw Your consent, We reserve the option to not allow You to undertake any transaction or access Our service for which the said Information was sought. However, if You are a part of any on-going transaction, We reserve the right to retain all Your financial information until completion of the transaction. Further, You acknowledge and agree that in case of such withdrawal of Your consent, the Company reserves the right to store Your information in an anonymised form, such that the Information stored will not be attributable to You or identify You in any manner whatsoever. The Company shall complete the anonymizing of the data [] 45 days from the date of withdrawal of consent.

25. Rectification of Data

You represent and warrant that any and all Information, is absolutely correct and complete in all aspects. You further undertake to immediately update any change or variation of Your Information by sending Us a request in writing to [corporate@birlatyre.com] to rectify or update Your Information. Once You send an email to Us, You agree to comply with the instructions as may be provided/communicated by Us. You have a right to have incomplete, incorrect, unnecessary or outdated PI about you deleted or updated.

26. Rights of the Users

Your rights with respect to data protection and privacy are:

The right to access Information;

The right to rectification of Information;

The right to erasure of Information;

The right to restrict processing;

The right to object to processing;

The right to complain to a supervisory authority;

The right of grievance redressal;

The right to withdraw consent; and

The right to nominate.

27. You have the right to confirmation as to whether or not We process Your Information and, where We do, the website and/ or any other source where from the access to such Information, together with certain additional information, is obtained. That additional information includes details of the purposes of the processing, the categories of Information concerned and the recipients of such Information. Provided the rights of others are not affected, We will supply to You a copy of Your Information.

28. You have the right to have any inaccurate Information about You rectified and, taking into account the purposes of the processing, to have any incomplete Information about You completed.

In some circumstances You have the right to the erasure of Your Information (done manually) without undue delay. Those circumstances include: (i) the Information is no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) You withdraw consent to consent-based processing; (iii) You object to the processing under certain rules of applicable data protection law; and (iv) the processing is for direct marketing purposes and (v) the Information have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary, for exercising the right of freedom of expression and information, for compliance with a legal obligation, or for the establishment, exercise or defence of legal claims.

29. Right to restrict processing of Your Information: In the following circumstances You have the right to restrict the processing of Your Information: Where, (i) You contest the accuracy of Your Information; (ii) processing is unlawful but You oppose erasure; (iii) We no longer need Your Information for the purposes of Our processing, but You require Your Information for the establishment, exercise or defence of legal claims; and (iv) You have objected to processing, pending the verification of that objection. In the event the processing has been restricted on the above circumstances, We may continue to store Your Information. However, We will only otherwise process it, with Your consent, (i) for the establishment, exercise or defence of legal claims; (ii) for the protection of the rights of another natural or legal person; and (iii) or for reasons of public interest.

30. You have the right to object to Our processing of Your Information on grounds relating to Your particular situation, provided such objection is not to the extent, as far as practicable, of processing where the legal basis of such processing is necessary for, (i) undertaking a transaction carried out in public interest or in the exercise of any official authority vested in Us; or (ii) the purposes of legitimate interests pursued by Us in a bona fide manner.

31. If You make such an objection as mentioned above, We will cease to process the Information, provided that We shall not cease such processing if We can demonstrate compelling and legitimate grounds for the processing which override Your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

- 32.** You have the right to object to Our processing of Your Information for direct marketing purposes, including profiling for direct marketing purposes. If You make such an objection, We will cease to process Your Information for this purpose.
- 33.** Where processing is for scientific or historical research purposes or statistical purposes, You have the right to object to Our processing of Your Information on grounds relating to Your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest, to the extent that the legal basis for our processing of Your Information is: (a) consented; or (b) that the processing is necessary for the performance of a contract to which You are party; or (c) in order to take steps at Your request prior to entering into a contract, and such processing is carried out by automated means.
- 34.** You have the right to receive Your Information from Us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of other users as well as that of SHPL and its affiliates.
- 35.** If You consider that Our processing of Your Information infringes data protection laws in India, You have a legal right to lodge a complaint with a supervisory authority responsible for data protection.
- 36.** To the extent that the legal basis for Our processing of Your Information is consented, You have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 37.** You may exercise any of Your rights in relation to Your Information by written notice to Us by email at the below mentioned address:
- 37.1.1. Mr. Prakash Dalmia
 - 37.1.2. 23A, Netaji Subhas Road,
 - 37.1.3. 8th Floor, Suite No. 15,
 - 37.1.4. Kolkata, West Bengal,
 - 37.1.5. India-700001
 - 37.1.6. (E-mail): [dalmia.prakash.btl@dalmiabharat.in]
- 38.** BTL will take reasonable steps to resolve Your queries at the earliest. However, in any event We will provide You the response within a period of 3 [three] months from the receipt of such requests. In case We are unable to address Your concern within the said period, We will communicate the same along with reason for delay during the said period.

39. Use of Cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to You on the website. We may store temporary or permanent 'cookies' on Your computer/device to store certain data (that is not SPDI). You can erase or choose to block these cookies from Your computer. You can configure Your computer's browser to alert You when We attempt to send You a cookie with an option to accept or refuse the cookie. If You have turned cookies off, You may be prevented from using certain features of the website. We do not control the use of cookies by third parties.

- 40.** You represent and warrant that the information provided by You and regulated by this Privacy Policy is true, correct, consistent and accurate and that you agree and shall indemnify and save harmless the Company from time to time, promptly upon demand against any and all losses, claims and/or actions relating to or arising out of any inaccuracy in the information provided by You. You agree to periodically update the information provided by You by sending an email at [corporate@birlatyre.com] as and when there is any change in information so provided.

41. Security of Information:

Your security is important to Us. We adopt reasonable security practices and procedures to include technical, operational, managerial and physical security control measures in order to protect Your Information in Our possession from loss, misuse and unauthorised access, disclosure, alteration and destruction.

We maintain physical, electronic and procedural safeguards in connection with the collection, storage, processing and disclosure of Information. Our security procedures mean that We may occasionally request proof of identity before We disclose Personal Information to You.

Our reasonable security measures shall be audited by an auditor at least once a year.

42. Policy Changes

We reserve the unconditional right to change, modify, add, or remove portions of this Policy at any time, without specifically notifying You of such changes. Any changes or updates will be effective immediately. You should review the privacy notice, published on the Website at [<https://www.birlatyre.com>], regularly for changes. If We make any significant changes, We will endeavour to provide You with reasonable notice of such changes, such as via a prominent notice to Your email address on record with Us and where required is applicable by an Indian law, We will obtain Your consent. Your acceptance of the amended policy and/ or Your continued use of Our services after We publish or send a notice about Our changes to this Policy shall signify Your consent to such changes and be legally bound by the same. In case of breach of Information, We will notify You via email and intimate the Board in the manner prescribed in the laws, on record with Us, when We are aware of such breach at the earliest as practicable.

43. Grievance Redressal

BTL shall address any discrepancies and grievances of provider of the information with respect to processing of information in a time bound manner. If You have any discrepancies or grievances relating to the processing or usage of Information provided by You in connection with this Policy, please email Us at dalmia.prakash.btl@dalmiabharat.in [] or write to Us at the following address, Your grievances shall be addressed by the Grievance Officer within 1 (one) month from the date of receipt of grievance:

Mr. Prakash Dalmia

23A, Netaji Subhas Road,

8th Floor, Suite No. 15,

Kolkata, West Bengal,

India-700001

(E-mail): dalmia.prakash.btl@dalmiabharat.in

44. Updates to our Privacy Policy

We may need to update our Privacy Policy. The latest version of our Privacy Policy is always available on our website.