Voltas - Privacy Notice

INTRODUCTION:

Voltas Limited (together with its subsidiaries, joint ventures and affiliates, hereinafter "**Voltas**, "**us**," "**we**," "**our**" or the "**Company**"), place paramount importance on safeguarding the privacy and security of your personal information and data ("**Personal Data**"), consider trust as our top priority and take the protection of your Personal Data very seriously. We want you to feel safe using our websites and portal such as <u>https://www.voltas.com</u>, <u>https://www.voltasservice.com</u>, <u>https://www.voltas.in</u>, <u>http://voltbekoservices.com/</u>, <u>https://www.voltasbeko.com/</u>, <u>https://voltasglobal.com/</u>, <u>https://www.umpesl.com/</u>, services, mobile applications, and solutions (collectively referred to as "**Platform(s)**").

This Privacy Notice (*as defined below*) informs you of the way in which we collect, process, use, transfer, and store your Personal Data when you use our Platform(s), as well as your rights in relation to the Personal Data. In doing so, we ensure that your privacy must be protected through lawful and proper means of managing Personal Data. Therefore, we have implemented this Privacy Notice (hereinafter referred to as "**Privacy Notice**").

Please read this Privacy Notice carefully prior to accessing our Platform(s) or availing our services, as offered on these Platform(s). By accessing and using our Platform(s), you hereby acknowledge that you have read, understood, and agree to the processing of your Personal Data in accordance with the terms of this Privacy Notice and our Terms of Use.

SCOPE:

This Privacy Notice applies to you when you visit our Platform(s) or when you browse or interact with our Platform(s) to avail our products or services or for any other activity carried out on the Platform(s).

PERSONAL DATA WE COLLECT AND PURPOSE FOR PROCESSING:

We only collect relevant Personal Data. The types of Personal Data relating to you that we may collect, and the purposes for which we process this Personal Data, depends on the nature of your interaction with us. Please read the table below for more information, including the purposes under which we collect and process your Personal Data.

When do we collect your	Types of Personal Data that we	Purpose for processing
Personal Data	may process	Personal Data
When you visit our	 Name, title, gender 	We use Personal Data:
Platform(s) or browse or	 Email address 	 to provide the
interact with our Platform(s)	 Location details/address 	services you request.
to avail our products or	Phone number	 to customize your
services or for any other	 Current employment 	user experience and
activity carried out on the	details	to improve our
Platform(s).	 Technical information 	Platform(s) and
	(including your IP	services.
	address, domain name,	

When you register on our Platform(s) by way of account creation	type of browser and operating system used) • Name • Email address • Phone number • Sign in with third party	 inform you about online and offline services and updates. To customize your experience. analyze how the Platform(s) are used, diagnose service or technical problems and maintain security. To explore career opportunities with us. We use Personal Data: to establish identity and verify the same. monitor, improve and administer our Platform(s). provide our services. send communication notifications. information regarding the services requested by you or process
		 queries and applications that you have made on the Platform(s). manage our relationship with you and inform you about other services we think you might find of some use.
When you visit our Platform(s) • First party cookies • Third party cookies	Please refer to our cookie policy below	Please refer to our cookie policy below
When you get in touch with us through our 'Contact Us' facility on our Platform(s)	 Name Email address Mobile number Address 	When you voluntarily write to us with a question or to ask for help with respect to an order or delivery related query.

When you login into Voltas 'Selfcare Portal' on the Platform(s) When you opt for our 'Call back feature' on the Platform(s) When you opt for 'Service Escalation' feature on the Platform(s) To stay in touch by subscribing to our newsletter, latest offers and promotions	 Phone number Email Address (After Login) Phone number Email id Email address Mobile number 	For services, enquiry and sales related issues For services, enquiry and sales related issues To resolve your service escalation requests To provide/share newsletters and marketing communications.
If you subscribe to 'Our Blog' section If you offer or provide services to us as our vendor	 Name Email Mobile Email Address Name Financial information GSTN PAN Geo-location 	To provide information about products and services and share newsletters. For registration purpose and business transactions
To apply for a career opportunity with us	 Name Email address Phone/ Mobile number Location Current employment details Resume / Curriculum Vitae (CV). 	Legitimate Interests (evaluative purposes): • For fulfilling our staffing requirements.
From third party payment gateways For sharing Personal Data	 Financial information e.g UPI, financial institution details. Name Email Address Mobile Personal Data including but not 	For providing products and services and confirming transactions and/or purchases of product or availing of services.
with our affiliates, subsidiaries and group companies	limited to Name, Age, Email, phone number.	under our agreement with our affiliates, subsidiaries and group companies for business purposes.
From third party Service providers when you use our service channels via Call Centre, IVR, Website, Social	 Name Email Address Mobile 	This is used by Voltas and Voltas' third party service providers to cater and fulfill your service requests raised

Media, Dealer-app, Sales	using Call Centre, IVR,
and Service Dealer, Dealer	Website, Social Media,
app, SR Import, Pm schedule	Dealer-app, Sales and Service
	Dealer, Dealer app, SR
	Import, Pm schedule.

Personal Data will not be further processed in a manner that is incompatible with these purposes.

It is clarified that any data which does not reveal your specific identity, does not relate to an identified or identifiable individual, information that is publicly available, information about software and hardware usage, or any anonymized or aggregated data ("**Other Information**") is not considered as Personal Data.

Information we collect automatically:

Device and Log information: When you access our Platform(s), we collect information that web browsers, and servers typically make available, including the browser type, browser version, IP address, unique device identifiers, language preference, referring site, the date and time of access, and operating system.

<u>Usage information</u>: We collect information about your usage of our Platform(s). We also collect information about what happens when you use our Platform(s) (e.g., page views, interactions with other parts of our services, time and date of your visit, the time spent on those pages and other diagnostic data). We use this information to supply our Platform(s) to you, get insights on how people use our Platform(s) so that we can make our Platform(s) better, and understand and make predictions about user retention and interest highlighted.

Information from Cookies: A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. They are small data files placed on your device that a website stores on your computer while you are browsing a website. We may collect information about you using cookies. We utilize cookies to accumulate small fragments of information on designated portions of the application to facilitate analysis of our Platform(s) and user engagement. Cookies are used to reduce the frequency of password entry during a session. Cookies further assist us in obtaining information beneficial for tailoring services more precisely to your interests.

We use third party cookies on our Platform(s). Use of this information helps us identify you and to make our Platform(s) more user friendly. We may use cookies and other technologies to store your preferences and settings, help you with signing in, provide targeted ads and analyse Platform(s)operations. Please refer to our cookie policy for more information.

If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your device. Although you are not required to accept cookies when you visit our Platform(s), if you set your browser to reject cookies, you may not be able to use all of the features and functionality of our Platform(s).

<u>Usage of third-party AI tools:</u> We may use third-party artificial intelligence (AI) tools and services to support various functions of our Platform(s) and services, such as data analysis, personalization, and content optimization. These AI tools may process certain types of Personal Data, such as device

information, interaction history, browsing behaviour, or other usage data, to help us deliver more relevant content, improve performance, and enhance user experiences.

The data processed by these tools is subject to strict contractual safeguards and is handled in compliance with applicable data protection laws. We only engage with third-party providers that maintain appropriate security measures and privacy practices. While we take reasonable steps to ensure that our AI service providers comply with relevant data protection laws, we do not control how these third-party tools operate or process data, once it is, shared in accordance with our agreements. We encourage you to review the privacy policies of these third-party providers for more information on how they handle your data. By using our Platform (s) and availing our services, you acknowledge and agree to our use of such AI tools under the terms described in this notice.

Failure to Provide Personal Data We Request: We need your Personal Data to comply with business and/or legal obligations or to perform our services, failure to provide this Personal Data may impact our ability to provide our services.

PERSONAL INFORMATION FOR MAKING PAYMENT ON THE PLATFORMS:

Please note that when you use the payment feature on our Platform(s), we do not collect any financial information or any other personally identifiable information (at the time of payment). The Platforms may also be utilized under relevant contractual arrangements with respective payment gateways for enabling making payments on the Platform(s).

When you use any payment feature on the Platform(s), certain financial information may be required to facilitate the processing of such payments. You are to note that the Platform(s) engage with third party payment service providers/ third party payment gateways to enable you to process your payments in connection with the use of any payment feature. You will be required by such third-party payment service providers to provide certain Personal Data to facilitate financial transaction on the Platform(s). Please note that to this extent, you will be subject to the terms of use and privacy policy that is maintained by such third-party service providers and the Platform(s) do not collect any such financial transactional information. The Platform(s) will only check and validate the status and success of such financial transaction from such third parties and maintain the validated information in relevant ledger for providing and fulfilling our services and products.

MARKETING AND PROMOTIONAL COMMUNICATIONS:

We may use your email address to send our newsletters and/or for marketing communications. If you no longer wish to receive these communications, you can withdraw your consent by following the instructions contained in the emails you receive or by contacting us at <u>dataprotection@voltas.com</u>.

CHILDREN DATA:

Our Platform(s) are not directed at children who are under the age of 18 and are solely intended for adults. We do not knowingly collect Personal Data from children under 18. Our services are not directed at anyone who is under the age of 18 years, nor do we collect any Personal Data from

anyone who is under the age of 18. If You are under the age of 18 years, please do not use our Platform(s) and do not submit any personal information/Personal Data to us.

If you have a reason to believe that a child under the age of 18 years has provided Personal Data to us, through the Platform(s) please contact us at 'Contact Us' section mentioned below and we will endeavour to delete that Personal Data from our database.

RETENTION - HOW LONG WE KEEP YOUR PERSONAL DATA:

We only retain your Personal Data for the period required to fulfill the purposes for which it was collected and processed in accordance with applicable laws or until you withdraw your consent and in accordance with our retention policies. For instance, if you have provided Personal Data while raising a query, we may retain this Personal Data if your account still is active on our system.

If your Personal Data is no longer needed for such purposes, we will promptly remove it or anonymize it by removing any identifiable details. Please refer to our data retention and deletion policy here.

Nevertheless, there are certain circumstances where we may need to keep your Personal Data for legitimate business or legal reasons or provide substantial evidence of record. These may include obligations related to compliance with applicable laws, for regulatory compliance, audit, accounting contractual purposes or reporting requirements. Additionally, certain data may be kept for extended periods to fulfil purposes such as ensuring security, preventing fraud and abuse, keeping financial records and/or to resolve any future dispute.

We regularly review our data retention policies to ensure compliance with applicable laws. We may retain Other Information indefinitely or to the extent allowed by applicable laws. Our retention guidelines/policy is applicable even when you no longer are using our Platform(s) or availing our services.

YOUR RIGHTS:

You can exercise the following rights as provided under applicable laws:

- <u>Right to Access Information about Personal Data</u>: The right to obtain confirmation and summary of whether Personal Data is being processed and, if so, the processing activities undertaken and to access that data, or any other information related to the Personal Data and its processing.
- **<u>Right to be Informed:</u>** You have the right to request, at any time, information regarding the identities of all other data fiduciaries and data processors, if applicable, with whom your Personal Data has been or will be shared by us, along with a description of the Personal Data being shared.
- **<u>Right to Correction</u>**: The right to request the correction or amendment of inaccurate or incomplete or outdated Personal Data.
- **<u>Right to Erasure</u>**: The right to request the deletion or removal of Personal Data under certain circumstances.
- <u>**Right to Grievance Redressal</u>**: The right to easily access grievance resolution mechanisms against any action or failure on our part, related to our responsibilities and concerning our handling of your Personal Data.</u>

• <u>**Right to Nominate**</u>: The right to appoint another person, to act on your behalf in case of mortality or incapacity. In this context, "incapacity" refers to the inability to exercise rights due to mental unsoundness or physical infirmity.

To exercise any of the above-mentioned rights, please contact us at <u>dataprotection@voltas.com</u> for further guidance. Upon verifying the authenticity of such a request, we will process such requests in accordance with applicable data protection and privacy laws of India. Please note, to protect your privacy, we will take steps to verify your identity before processing and fulfilling your request.

SECURITY OF YOUR PERSONAL DATA:

The security of your Personal Data is of utmost importance to us. We take reasonable measures to safeguard the information you provide, ensuring protection against loss, unauthorized access, disclosure, and misuse. We take appropriate technical and organizational measures to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, your Personal Data, in accordance with our internal security procedures. These measures are designed to align with the sensitivity of all the Personal Data we collect, process, and store, as well as the current advancements in technology.

We work hard to protect your Personal Data from unauthorized access, alteration, disclosure or destruction, including taking steps which include:

- (a) all Personal Data during transit and at rest and use is encrypted with the use of Secure Sockets Layers (SSL) or TLS based encryption, for the transmission of the information.
- (b) We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems.
- (c) We restrict access to Personal Data to our authorised personnels and third parties who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- (d) Compliance with applicable laws, rules and regulations.
- (e) We regularly review this Privacy Notice and make sure that we process your information in ways that comply with it.
- (f) Storing Personal Data on secure cloud servers with appropriate firewalls.
- (g) Anti-malware and intrusion detection systems are utilised to guard against unauthorized access to our network.
- (h) Implementation of multi-factor authentication system to access your account and profile.
- (i) We maintain your Personal Data on servers located in India. Data protection laws vary among countries, with some providing more protection than others. We also comply with certain legal frameworks relating to the transfer of data as mentioned and required under the Information Technology Act, 2000 or other applicable data protection laws.

However, it is important to note that due to the inherent nature of communication and information processing technology, we cannot guarantee absolute security against external intrusions while transmitting data over the Internet or when it is stored in our systems. Given the nature of internet transactions, we do not take any responsibility for the transmission of Personal Data you provide to us or on the Platform(s). Any transmission of your Personal Data on the internet is done at your risk.

We do not take any responsibility for you or any third party circumventing the privacy settings or security measures contained on the Platform(s). You also agree and understand that data

transmission over the internet may be liable to risk and we would assume no liability for any disclosure of information due to errors in transmission issues or unauthorized third-party access to our Platform(s) or databases.

You acknowledge that as a registered user on the Platform(s) you are responsible for maintaining the security of your account such as your account login credentials and passwords, and that you should not provide these credentials to any unauthorized user or third party. If it comes to your knowledge or if you have reason to believe that your account credentials have been stolen or been made known to others, you must contact us immediately at the 'Contact us' section as provided on the Platform(s) you visit. You acknowledge that you are responsible for all acts done, using your account login credentials. We are not responsible if someone else accesses your account on account of your failure to maintain the security of your account credentials. If we determine that you are engaged in malicious activity on the Platform(s), such as data scrapping, privacy violations, illicit data mining, profiling, or the unauthorized transmission of user data/Personal Data, or hampering the use of the Platform(s), we shall block your access to the Platform(s) and your account may not be ever retrieved.

THIRD PARTY LINKS AND WEBSITES:

Our Platform(s) may contain links to other sites operated by third parties, including social media websites, communication channels and services. We are not responsible for information on these sites, nor for services or products offered by them. By providing these links we do not imply that we endorse or have reviewed these sites. Use of these sites, including transmitting your Personal Data to them, is at your own risk. The information that you share with these sites will be governed by the specific privacy policies and terms of service of these third-party sites and not by this Privacy Notice. Please contact those sites directly for information on their privacy practices and policies. Their data collection practices, and their policies might be different from this Privacy Notice and our Terms of Use and we neither have control over any of their policies nor do we have any liability in this regard.

We remain committed to protecting your Personal Data and ensuring compliance with the applicable laws.

ANALYTICS:

We use cookies from third-party partners such as Google Analytics, Microsoft Clarity, Shopify interalia for marketing and analytical purposes. These third-party cookies help us understand how our customers use the Platform(s). You can read more about how Google uses your Personal Data <u>here</u>. You can also opt-out of Google Analytics <u>here</u>. You can read more about Microsoft Clarity <u>here</u>, <u>here</u> and <u>here</u>. For Shopify cookies please refer <u>here</u>.

HOW WE SHARE YOUR PERSONAL DATA:

We may disclose and share your Personal Data with:

- Our parent and subsidiary company, affiliates, or collaborated institutions.
- Third-party service providers- Third parties who provide services to us have access to your Personal Data. For the purposes described above, we engage service providers to provide their services, including (without limitation) payroll managers, delivery and logistics

partners, payment processors. These parties may access, use, process or store Personal Data in the course of performing the services we have hired them to provide.

- Third parties where we have a duty to or are permitted to disclose your Personal Data by law- Courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or to establish, exercise, or defend our legal rights.
- To our authorised personnels on a need-to-know basis only.
- Our existing or potential agents or business partners.
- We and our affiliates may disclose and transfer your information and Personal Data to a third party: (a) if we assign our rights regarding any of the information to a third party or (b) in connection with (including negotiations for) a corporate merger, consolidation, restructuring, sale of certain of our ownership interests, assets, or both, or other corporate change, including without limitation, during the course of any due diligence process.
- External consultant or auditors engaged by us, for internal audits or otherwise, for ensuring compliance with applicable laws.

Personal Data Transfer: Voltas may share/ transfer your Personal Data with its affiliates, group companies outside India for its business purposes. For this purpose, Voltas will enter into data transfer agreement which incorporates the standard contractual clauses for the transfer of data to outside India.

PRIVACY GRIEVANCES/CONTACT US:

If you have any questions about this Privacy Notice, wish to exercise your rights under applicable laws, have concerns about privacy of your Personal Data or any privacy related grievances in respect of the Platform(s), then please contact us through any of the following methods:

Email- Id: <u>dataprotection@voltas.com</u> Postal Address: Voltas House 'B', Dr Babasaheb Ambedkar Road, Chinchpokli, Mumbai 400 033

We will make every effort to respond to your inquiry promptly and ensure that your privacy rights are respected and upheld.

UPDATES TO THIS PRIVACY NOTICE:

By using the Platform(s) and our products and services / or by providing your information, you consent to the collection and use of the Personal Data you disclose during your interaction with us in accordance with this Privacy Notice, including but not limited to your consent for collecting, processing, using, sharing, storing and disclosing your Personal Data and Other Information as per this Privacy Notice.

We reserve the right to amend/update this Privacy Notice from time to time to reflect changing legal requirements or our processing practices. Any such changes will be posted on our Platform(s) and will be effective upon posting. If we make a material change to this Privacy Notice, we will provide you with notice in accordance with the applicable laws to inform you of such material changes or updates.

Your continued use of the Platform(s) after any changes to this Privacy Notice are posted, will be considered as deemed acceptance of those changes. The date of the latest version of the Privacy Notice will be identified at the bottom of the policy.

Last updated on 10 June 2025