

# PIDILITE INDUSTRIES LIMITED

## Privacy Notice

---

### 1. Introduction

Pidilite Industries Limited ("**Pidilite**" or "**The Company**" or "**We**") is committed to protecting your personal data and your rights as data principal in compliance with the privacy laws as applicable from time to time. We ensure protection of your personal data and its lawful processing across the organization.

The objective of this Privacy Notice is to inform you about the purposes for which we process your personal data, the legal bases upon which we rely to process it lawfully and the retention periods applicable to the personal data that Pidilite holds about you.

### 2. Applicability

This Privacy Notice applies to all current and former users (collectively "You" or "Your") accessing or using our website, or otherwise engaging with us through email or other means. By accessing or using our website or by otherwise giving us your information, you confirm that you have read and understood and agreed to the practices outlined in this Privacy Notice.

This Notice is not intended and shall not be read to create any express or implied promise or contract for employment, for any benefit, or for specific treatment in specific situations. Nothing in this Notice should be construed to interfere with Pidilite's ability to process visitor data for purposes of complying with our legal obligations, or for investigating alleged misconduct or violations of company policies or law, subject to compliance with local legal requirements.

### 3. Definitions

"**Pidilite**" means Pidilite Industries Limited and its subsidiaries and affiliated entities worldwide.

"**Associates**" means directors, officers, employees, temporary workers, contract employees, partners, agents, consultants, associated third parties, intermediaries, or any other person or party acting on their behalf.

### 4. Your Personal Data That We Will Process

Please note that we process personal data for legitimate business purposes only. The personal data that we process may include the personal data that you share with us or we collect about you or we assign to you. We process personal data primarily for managing our business relationship with you, managing your interactions with Pidilite's website and for compliance with applicable regulatory requirements.

This is a non-exhaustive list of the personal data that Pidilite may process:

- **Name and contact data** - first and last name, email address, mailing address, phone number, date & purpose of visit, asset information, designation, company/ organisation, location.
- **National identifiers** - National ID/passport, government identification number.

- **Video, voice and image** - We may collect and use your video, voice and image data subject to the requirements of local law, internal Notice.
- **Internet details** - Information collected as part of your visit and usage of our websites such as Internet Protocol (IP) address, demographics, your computers' operating system, device information, telemetry data and browser type and information collected via cookies or similar tracking technologies. As a website visitor who merely browses our websites (including the hosted content) without submitting any additional data.
- **Login credentials** - Username and Passwords, when you register for any of our applicable services.
- **Communication** - Queries, comments, or feedback as submitted by you, including any correspondence you have made with us.
- **Preferences** - relating to marketing communications, interest areas, subscription details, and dietary preferences/allergies (in relations to events we may organize).

The personal data that we process about you will vary depending on your purpose of visit and circumstances.

## 5. Collection of personal data

In most cases, we get your personal data directly from you. However, at times, we may also collect or receive some of your personal data from other sources such as through Pidilite employee, our social media touch points, trusted third party etc. Being Data Fiduciary, we ensure the data is processed in due compliance with the applicable legal requirements.

## 6. Need of personal data

We collect your personal data for the purposes set out below. Failure to provide your personal data when requested may prevent us from being able to carry out these tasks and/or comply with our legal obligations.

In general, the indicative list of purposes for which Pidilite may process your personal data includes:

- Manage and maintain our relationship with you, including responding to an inquiry, question or comment made by you.
- To engage in marketing and business development activities in relation to improving and promoting Pidilite's products and services.
- To deliver advertising targeted to your interests on other companies' sites or mobile apps.
- Improve the products and services we offer to you and administering the security of our business.
- To conduct analysis and market research to improve this website.
- Inform you about our products or service offerings by communicating through email, SMS, phone and any other similar communications means.
- To invite you for events, seminars and equivalent ceremonies organized by us and related purposes such as running marketing or promotional campaigns, including such promotions or publications on social media.
- To publish testimonials and case studies.
- To generate and maintain leads as part of our Customer Relationship Management database.
- We may process personal data as part of our audit processes.
- To comply with the laws as applicable from time to time.
- To pursue our legitimate interests as your employer where our interests do not override fundamental rights and freedoms.

Provided below are the exceptions that may apply to the processing of personal data relating to you. These shall solely be used for.

- a. Where processing your personal data relates to the data that you have manifestly made public.
- b. To establish, exercise or defend legal claims.
- c. For reasons of substantial public interests based on local laws and when the processing is proportionate to the aim that we are pursuing.

## **7. Lawful basis of Processing**

**Consent:** In some cases, we ask you for your Consent to process your personal data.

**Legitimate Interest:** We process certain data for the legitimate interests of the Company, its affiliates, partners, customers, or in compliance with applicable laws including Notice from government authorities.

**Performance of a Contract:** We also process personal data based on contractual necessity, where it is necessary for the performance of a contract or pre-contractual steps at your request.

**Other Legal Basis:** In some cases, we may have a legal obligation to process your personal data, such as in response to a court or regulator order. We also may need to process your personal data to protect vital interests, or to exercise, establish, or defend legal claims.

## **8. Links to Third Party Websites**

Our website may provide links to other websites, which have their own privacy terms. Such websites will be governed by their respective privacy terms, and you can refer to them to understand how they process your personal information.

## **9. Change of Purpose**

We will only use your personal data for the purposes for which we collected it unless we reasonably need it for another compatible purpose and there is a legal basis for further processing. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so without undue delay. Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

## **10. Data retention**

When we process your personal data, we ensure that we only process it for as long as necessary to achieve the purposes for which it was collected or till the time it is required to be retained by law post conclusion of your business relation with the Company or for any legitimate business purposes.

## **11. Data transfers to third parties**

Pidilite will share your personal data in compliance with the laws as applicable from time to time and only with those who have a legitimate business need for it. We may transfer some of your personal data to third parties for the performance of such processing operations. Where this is the case, the transfer of the personal data and the data processing takes place only in accordance with applicable laws and is regulated by legal agreements, if applicable.

Your personal data may be shared with our subsidiaries and affiliates and other third parties, including service providers, for the purposes including but not limited to:

1. In order to carry out the purposes of our personal data processing as described above.

2. To enable third parties to provide services on behalf of Pidilite.
3. To comply with our legal obligations, regulations, government clearances, or contracts, or to respond to data principal's rights, a court order, administrative or judicial process.
4. In response to lawful requests by public authorities.
5. To seek legal advice from external lawyers and advice from other professionals such as accountants, management consultants, etc.
6. As necessary to establish, exercise or defend against potential, threatened or actual litigation.
7. Where necessary to protect Pidilite, your vital interests, such as safety and security, or the vital interests of other persons.
8. In connection with the sale, assignment or other transfer of all or part of our business (such as a potential purchaser and its legal/professional advisers); or
9. Otherwise in accordance with your consent.

## **12. Retention of Personal Information**

Your personal data is processed and retained securely for no longer than is necessary for the purposes for which the personal data was collected or unless required as per the applicable laws.

## **13. Confidentiality and Security Measures**

You can be assured that your data is always treated confidentially by Pidilite and other parties that we have contracted with. We only transfer data to third parties if this is necessary and where there is a legal basis to. We adopt technical and organizational measures to protect your data as comprehensively as possible.

In addition to the commitment of our associates to confidentiality and a careful selection and monitoring of our service providers, we also secure our operating environment adequately.

## **14. Your Privacy Rights**

As a Data Principle you have the rights as provided under laws from time to time. Please note that some exemptions and restrictions prescribed under applicable laws can be applied by Pidilite that may restrict the fulfilment of your rights.

## **15. Children Information**

We do not knowingly solicit or collect personal information from children under the age of eighteen. If you are under the age of 18 years then you must use the website under the supervision of your parent, legal guardian, or any responsible adult. As such we do not knowingly solicit or collect personal information online from children without prior verifiable parental consent. If Pidilite learns that a child has submitted personal information online without parental consent, it will take all reasonable measures to delete such information from its databases and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law). If you become aware of any personal information we have collected from children, please contact the resources provided in this Notice.

## **16. Cookies**

We use cookies and similar technologies to analyse and understand how you access, use, and interact with our website and our consumer's preferences as well as to assess, secure and improve the performance of our website. To know more on our use of cookies, please refer to our Cookie Policy.

## **17. Social Media**

We operate channels, pages, and accounts on some social media sites to inform, assist and engage with employees, vendors, clients/customers, and public at large. We monitor and record comments and posts made on these channels about us to improve our products and services.

It is advisable to use official and authorized channel only for communication purposes. Please be aware of communicating with us through publicly accessible social media sites with the following information:

- confidential, personal data, including any information regarding your financial situation, bank account details, transactions, etc.
- special categories of personal data meaning any information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation and (ii) other personal data such as criminal convictions and offences and national identification number; and
- inappropriate, offensive, or insulting information towards individuals.
- transmit any content, data or information that is unlawful, harmful, threatening, abusive, harassing, tortious, defamatory, vulgar, obscene, libellous, invasive of another's privacy or right of publicity, hateful, or racially, ethnically, or otherwise objectionable.
- Any information that infringes, violates, or impacts the rights including intellectual property rights of others.
- Pidilite is not responsible for any information posted on those sites other than the information posted by the employees authorized to publicise the information on its behalf. Our responsibility is limited to the utilization of personal data we obtain from these sites for our own purposes.

## **18. Your Duty to Inform Us of Changes**

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 your working relationship with us.

## **19. Changes to this Notice**

We may update this Privacy Notice as may be required from time to time. If there are material changes in how Pidilite will use your personal data, we will use reasonable efforts to notify by prominently posting on our websites. We encourage you to periodically review this document to know more about protecting your personal data.

## **20. Contact Details**

If you have any questions, comments or complaints, please contact us using the contact details as available on our website.

### **Consent**

I have read and understood the above privacy Notice and give my free, informed and expressed consent for processing my personal data in the manner as described in the Notice.