

Privacy Policy

Attention

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1. Introduction

Orient Cement Limited ("OCL" or "Company" or "We") is engaged in the business of manufacturing and marketing of cement which is suitable for all types of industrial, residential and commercial constructions.

OCL is committed to respect the privacy of its employees, customers, dealers, business partners, suppliers, vendors and all others (hereinafter together referred to as "Data Subject") who share their personal data or information with the Company ("personal information"). OCL makes reasonable efforts to comply with applicable privacy laws and adhere to leading practices consistent with business objectives. The purpose of this Policy is to give the personal information providers an understanding on how the Company intends to collect, receive, possess, store, transfer, handle, deal with and use such personal information.

2. What Personal Information We Collect

Personal information collected by us may include name, title, company, address, phone number, email address, financial details such as bank account, PAN, GST, salary, age, gender and other relevant data as may be required to be collected, maintained and transferred for business and official purposes as per lawful business requirements of the Company.

3. Why Do We Collect Personal Information

We collect personal information in order to conduct our business and allow us to provide and improve our service. Most commonly, personal information will be used in the following circumstances:

- a) To enable functioning of the Company's business,
- b) To carry out our obligations arising from any contracts entered into between you and the Company
- c) To notify you about changes to our service
- d) Fulfil a legal obligation (e.g., to meet the statutory duties of an employer or comply with an order by a competent authority);
- e) Where it is necessary for our legitimate interests [or those of a third party] and the Data Subject's interests and fundamental rights do not override those interests;
- f) To send statements, invoices and payment reminders to Data Subject, and to collect payments from Data Subject;



- g) To send commercial communications to Data Subject;
- h) To send Data Subject email notifications that Data Subject has specifically requested for;
- i) To deal with enquiries and complaints made by or about Data Subject relating to services provided;
- j) Where Data Subject has given OCL explicit consent to do so.
- k) Legal, judicial, governmental and regulatory compliance
- I) Compliance with company policies, code of conduct and internal regulations
- m) Perform a task carried out in the public interest or in the exercise of official authority vested in either OCL or a third-party recipient of the data;

4. Change of Purpose

We will only use Data Subject information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use Data Subject information for an unrelated purpose, we will notify the Data Subject accordingly.

Please note that we may process Data Subject information without Data Subject's knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Consent

We process your personal information if you have consented to the processing activity. You may revoke your consent at any time. Doing so will bar us from further processing of your personal data based on your consent but will not impact the lawfulness of processing based on your consent before it was withdrawn. Some of the features of our products and services might be only available based on consent.

6. Information Sharing and Disclosure

We may disclose Data Subject personal information to any of our employees, officers, insurers, professional advisers, agents, auditors, suppliers or subcontractors insofar as reasonably necessary for the legitimate business and related purposes set out in this policy.



We may also need to share the personal information with our group companies within and outside India, business associates and/ or third parties within and outside India in connection with the lawful business and related purposes, as mentioned above. Except as provided in this policy, we will not provide Data Subject Information to any other third party.

The personal information providers authorize the Company to exchange, disclose, transfer, share, part with the personal information and/or any information provided, within or outside India for the above purposes.

7. Transfer of information outside India

To ensure that the personal information of the data subject is protected in case of transfer outside India, measures such as contractual clauses with adequate data protection and privacy safeguards are implemented.

8. Automated Decision-Making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not envisage that any decisions will be taken about the Data Subject using automated means. However, we will notify Data Subject in writing if this position changes.

9. Use of services by Minors

No personal data is collected from minors.

10. Data Storage & Retention

We endeavour to only collect personal information that is necessary for the purposes for which they are collected, and to retain such data for no longer than is necessary for such purposes. The length of time the personal data is retained, and criteria for determining that time, is dependent on the nature of the personal information and the purpose for which it was provided subject to any legal requirements for the information to be retained for longer period, if any. OCL is committed to store information with reasonable safeguards against loss and disclosure.



Reasonable safeguards include using physical and technological protections are in place against unauthorised access.

11. Data Security

The Company has adopted reasonable security practices and procedure to ensure that the personal information is collected and preserved in a secured manner. We have assigned specific responsibilities to address privacy and security related matters. We enforce our internal policies and guidelines through an appropriate selection of activities, including proactive and reactive risk management, security and privacy engineering, training and assessments. We take appropriate steps to address online security, physical security, risk of data loss and other such risks taking into consideration the risk represented by the processing and the nature of the data being protected. OCL has a robust ISO-based Management System (ISMS) and it is ISO 27001 certified Company. While the Company will endeavour to take all reasonable and appropriate steps to keep secure any information and prevent its unauthorized access, the information providers agree and acknowledge that the Company cannot provide any absolute assurance regarding the security of the personal information. To the fullest extent permissible under applicable laws, the Company disclaims any liability in relation to any breach of security or loss or disclosure of information in relation to the personal information.

12. Data Subject Rights

You have the right to request from us access to and rectification or erasure of your personal information or restriction of processing concerning you and to object to processing as well as the right to data portability. In particular, you have the right to request a copy of the personal data that we hold about you. If you would like to transfer your personal data to another controller, we will provide you with the personal data which you provided to us and which has been processed by automated means in a machine-readable portable format free of charge. As we want to make sure that your personal data is accurate and up to date you may also ask us to correct or remove any information which you think is inaccurate.

For any of the above requests, please send a description of your personal data concerned and state name, email address, your personal account and customer number as proof of identity to <u>data.privacy@orientcement.com</u>. We may require additional proof of identity to protect your personal data against unauthorized access.



If you have any concerns about how your personal data is handled by us or wish to raise a complaint on how we have handled your personal data, you can contact us at <u>data.privacy@orientcement.com</u> to have the matter investigated.

13. Changes to This Privacy Policy

The Company reserves the right to revise and update this Privacy Policy at any time without expressly informing the personal information providers. Any such revisions will be effective on and from the date of posting the same to the intranet/internet website of the Company and will apply to all information collected both prior to and following the effective date. We recommend that you should visit the website and intranet periodically to review the current policies with regard to personal information.

14. Contacting Us

The personal information providers may approach the Company if they have any grievance, questions or for reporting an incident with respect to the processing and use of their personal information. The Company can be contacted by mail at the email id <u>data.privacy@orientcement.com</u>