

## Privacy Policy

Tata Business Excellence Group, a division of Tata Sons Pvt Ltd ("TBExG or "we") takes the privacy of your information seriously. This privacy policy explains what personal data we collect from you on this website (<https://www.tatabex.com>) and how we use that data. This privacy policy applies to <https://www.tatabex.com>. This website may contain links to other websites whose privacy policy may differ from those of TBExG. If you provide data to any of these websites, your data is governed by their privacy policies.

### 1. Definitions

In this privacy policy, the following definitions are used:

#### **Data**

Includes information that you submit to TBExG via the website, information which is accessed by TBExG pursuant to your visit to the website.

#### **Data Protection Laws**

Any applicable law relating to the processing of personal Data, including the GDPR and the Information Technology Act, 2000 (and Rules framed thereunder), as amended or substituted

#### **GDPR**

The General Data Protection Regulation (EU) 2016/679

#### **TBExG, we or us**

Tata Business Excellence Group (TBExG), a division of Tata Sons, a company incorporated in India whose registered office is at Bombay House, 24, Homi Mody Street, Mumbai 400 001

#### **User or you**

The natural person who accesses the website

#### **Website**

The website that you are currently using, <https://www.tatabex.com>, as well as its sub-links and sub-domains

### 2. Scope

We collect data on this Website. You can visit this Website without telling us who you are. However, you may not be able to access certain functionalities of this Website if you do so.

You can make choices about our collection and use of your data. For instance, you may want to access, edit, or remove the personal information on the Website.

When you are asked to provide personal data, you may choose to not provide the information. However, if you do not provide the personal data, you will not be able to access certain functionalities.

### 3. Data Collected

**We may collect information or pieces of information that could allow you to be identified, including:**

**a.** Contact information: We collect your first name, last name, telephone/mobile number, time zone information, organization name and email id;

**b.** Your academic and professional information like educational achievements, designation etc., which you can voluntarily provide if you want to use certain features.

c. Additional organizational information like designation, department and region may be provided by authorized points of contact of organizations after following due diligence of employee data collection at source.

## 4. How we Collect Data

**We collect your data in the following ways:**

- a. data is given to us by you when you register;
- b. data that is collected automatically pursuant to your visit to this Website.
- c. data is given to us by you, by virtue of maintaining or updating your skill matrix in our system to be able to access / avail certain service offering provided by us through the Website or any other e-medium in future.

## 5. Data shared by You

**We may collect your Data in several ways from your use of this Website. For instance:**

- a. when you register on the Website and provide us Data;
  - b. when you use services like accessing learning modules etc;
  - c. when you select to receive any communications (including any newsletter, promotional offers) from us;
  - d. from the information gathered when you visit the Website.
  - e. when you contact us through the Website
- 6. Data that is collected automatically**
- a. We may automatically collect some information about your visit to this Website (such as IP address, navigation on the Website, etc.)
  - b. Our web servers or affiliates who provide analytics and performance enhancement services may collect IP address, operating system details, browsing details, device details and language settings.
  - c. Information about the services that you use and how you use them, like the name of the learning module, the duration of the course, interactions with the learning community, the scores/grades that you achieve while completing the course etc.
  - d. Device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number). The platform may associate your device identifiers or phone number with your Learning account.

## 7. Our Use of Data

**Data may be used by us for the following purposes:**

- a. provides, maintain, protect, improve, and develop new services provided;
- b. offer you tailored content – like giving you more relevant search results;
- c. contact for survey or feedback;

- d. when you contact us, we keep a record of your communication to help solve any issues you might be facing;
- e. improves your user experience and the overall quality of our services;
- f. to execute other activities such as marketing campaign, promotional communications.

We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

## 9. Who we share Data With

### **We may share your personal Data with:**

- a. Tata Sons-controlled affiliates and subsidiaries and other entities within the Tata group of companies, to assist them to reach out to you in relation to their programs or campaigns (including marketing and sales) and to process your query / requests (such as job application)
- b. our employees and professional advisors working on our behalf for the purposes described in this policy statement; and
- c. Service-providers who assist in protecting and securing our systems and provide services to us which require the processing of personal data, such as to host your information or to process your information for data profiling and user analysis.

### **We usually do not share personal Data collected from the Website with other third parties. However, this may happen if:**

- (a) You request or authorize us to do so;
- (b) We need to comply with applicable law or respond to valid legal process; or
- (c) We need to operate and maintain the security of this Website, including preventing or stopping an attack on our computer systems or networks.

If you have registered with us for any service needs hosted on [www.tatabex.com](http://www.tatabex.com), you will be considered part of the TBExG service ecosystem and your profile data and progress will be visible as active user in our respective user repository, until unless you write to [tbexg@tata.com](mailto:tbexg@tata.com) for any deactivation of your email address or your email address shows a permanent bounce back when we try to connect with you for any service information.

## 10. Your data accessed by other users of the Website

Your Data may be accessed and processed by some individuals from TBExG, on your formal request to service a technical request over email related to access issue etc. to [tbexg@tata.com](mailto:tbexg@tata.com) or Tata Group companies or our affiliates that require access to your data for the purposes mentioned in this privacy policy. However, your personal / Professional details shall not be used / replicated in any form whatsoever for any commercial/non-technical purposes outside TBExG.

## 11. Keeping Data Secure

We will use technical and organisational measures to safeguard your Data and we store your Data on secure servers.

Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please send an email to [tbexg@tata.com](mailto:tbexg@tata.com).

## 12. Retention of Personal Data

TBExG retains personal Data for as long as necessary to provide the access to and use of the Website, or for other essential purposes such as analysing participations and results in competitions, complying with our legal obligations, resolving disputes, and enforcing our

agreements. Because these needs can vary for different data types and purposes, actual retention periods can vary significantly.

Even if we delete your Data, it may persist on backup or archival media for audit, legal, tax or regulatory purposes.

We will retain personal data taken during registration, access, and completion for learning modules for 'user lifetime' (which is taken to be 80 years from the date of registration)."

### 13. Your Rights

When we process Data about you, we do so with your one-time consent and/or as necessary to provide the Website you use, meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfil other legitimate interests of TBExG, as described in this privacy policy.

**Below, you will find additional privacy information that you may find important. Tata Business Excellence (TBExG), adheres to applicable data protection laws in the European Economic Area, which if applicable includes the following rights in relation to your Data:**

**a.** Right to access - the right to request.

(i) copies of the information we hold about you at any time, or

(ii) that we modify, update, or delete such information.

If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is manifestly unfounded or excessive. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

**b.** Right to correct - the right to have your Data rectified if it is inaccurate or incomplete.

**c.** Right to erase - the right to request that we delete or remove your Data from our systems.

**d.** Right to restrict our use of your Data - the right to limit the way in which we can use it. We may not be able to block Google from tracking user behaviour as well as some demographic data, including Age and Geography.

**e.** Right to data portability - the right to request that we move, copy, or transfer your Data.

**f.** Right to object - the right to object to our use of your Data by giving it to third parties referred in paragraph 8 above. For information about managing your contact data, email subscriptions and promotional communications, please submit a request to us on [tbexg@tata.com](mailto:tbexg@tata.com)

We will use reasonable efforts to ensure that your personal data is maintained and up to date. However, you are under a duty to inform us of all changes to your personal data to ensure that it is up to date, and we will update or delete your personal data accordingly.

If you want TBExG to change your or your team members' information, please log-in to your profile and make changes. If you want us to remove it from the database entirely, please send an email at [tbexg@tata.com](mailto:tbexg@tata.com).

### 14. Security of Personal Data

Tata Business Excellence (TBExG) is committed to protecting the security of your Data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure.

### 15. Where We Store and Process Personal Data

In general, personal Data collected and processed under this statement is hosted on servers located in India. TBExG is part of a corporate group with affiliates and subsidiaries based in the European Economic Area (EEA), the U.S. and Asia. We take steps to ensure that the Data

we collect under this privacy policy is processed according to the provisions of this statement and the requirements of applicable law wherever the data is located.

To ensure that your Data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties we share your Data with. This ensures your Data is treated by those third parties in a way that is consistent with the Data Protection Laws.

## **16. Link to other websites**

This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

## **17. Cookies and similar technologies**

Cookies are files that websites send to your computer or another Internet-connected device to uniquely identify your browser or to store information or settings on your device. When you visit the Website, we may collect certain information by automated means, using technologies such as cookies, web server logs, web beacons and JavaScript. The Website is not designed to respond to "do not track" signals received from browsers. Your browser may tell you how to be notified when you receive certain types of cookies and how to restrict or disable certain cookies. Please note, however, that without cookies you may not be able to use all the features of the Website.

## **18. Severability**

If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

## **19. Changes to this Privacy Policy**

TBExG reserves the right to change this privacy policy as it may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website, and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.