

PRIVACY POLICY
Last Updated: 27.05.2022

About Bajaj Electricals Limited

Bajaj Electricals Limited ("**We**" and/or "**Us**" and/or "**Company**" and/or "**Our**") is engaged in the business of manufacturing and sale of consumer electrical equipment across India and other countries. The Company has its registered office at 45/47, Veer Nariman Road, Mumbai – 400001, Maharashtra and also has presence in locations across India and in foreign countries.

The Company operates the **Innovate & Rise** ("**Platform**") which enables users ("**User(s)**" and/or "**You**" and/or "**Your**") access of this website www.innovateandrise.bajajelectricals.com ("**Portal**"), accessing through a computer, mobile phone or any other device, to submit ideas for innovative technologies and solutions and / or as a reply to the challenges posted by the company ("**Innovations**") to the Company. The Company may utilize such Innovations as part of future products or service offerings and / or work collaboratively with the Users for developing, licensing, research, production, supply, sale or otherwise engaging with such Innovations and in respect of which the Company may enter into an agreement with the Users, at the Company's sole discretion.

About the Policy

Please read this Privacy Policy ("**Policy**") carefully before using the Portal. If You do not agree with the terms of this Policy, do not use the Portal or make any submissions through the Portal. This Policy is to be treated as an electronic form of contract under the Information Technology Act, 2000 and the rules made thereunder, as may be amended, reenacted or substituted from time to time. This Policy does not require any physical, electronic or digital signature and is a legally binding document between You and Us.

For the purposes of this Policy, unless defined hereunder, all capitalized terms shall have the meaning ascribed to them under the [Terms of Use](#) available on our Portal ("**Terms**").

This Policy explains and aims to provide You the following information:

- (a) User Consent;
- (b) Nature and categories of Information collected;
- (c) Purposes for collection of Personal Data and our basis for processing;
- (d) Sharing, disclosure and deletion of Information;
- (e) Storage and cross-border transfer of Information;
- (f) Your rights over Personal Data collected;
- (g) Security safeguards implemented to protect Information; and
- (h) Grievance Redressal procedure and contact details.

(A) User Consent

By accessing or using this Portal, You confirm that you have the capacity to enter into a legally binding contract under Indian law, in particular the Indian Contract Act, 1872, and have read, understood, and agreed to the terms and practices in this Policy.

We reserve the right to change, modify, add or delete portions of the terms of this Policy, at Our sole discretion, at any time. Such revised Policy shall become effective immediately upon receiving your consent to the said revised Policy through website popups or other means. If You are accessing or using the Portal from an overseas location, You do so at Your own risk, and shall be solely liable for compliance with any applicable local laws.

You should not access or use the Portal by means of any mechanism or technology which conceals your actual geo-location or provides incorrect details of your location (for example, use a virtual private network (VPN/Proxy)).

We will not be responsible or liable for any collection, storage or processing of your Personal Data if you use any mechanism or technology to access or use Portal which conceals your actual geo-location.

(B) Nature and categories of Personal Data collected

The types of information collected by Us would be dependent upon Our relationship with You, the circumstances of collection and Your actions on the Portal. This includes data in which You or other natural persons may be directly or indirectly identifiable ("**Personal Data**"), sensitive personal data (*as explained below*) and other data ("**Non-Personal Data**") (collectively referred to as "**Information**").

- (a) **Personal Data:** As per Indian data protection law, Personal Data may include data about or relating to natural persons that identifies (directly or indirectly) a particular individual or natural person, such as the individual's name, postal address, email address, and mobile number, having regard to characteristics, traits, attributes or any other feature to that particular person, whether online or offline, or any through any combination of features with any other information, including inference drawn from such data for the purposes of profiling;
- (b) **Sensitive Personal Data:** As per Indian Data Protection Law, "**Sensitive Personal Data**" may include financial data, health data, official identifiers, sexual orientation, biometric information, genetic data, sex life, transgender status, intersex status, caste or tribe and religious or political belief or affiliation.
- (c) **Non-Personal Data:** This may include such data that we automatically collect using the cookies / tracking tools that You have accepted as per the Policy and the Cookie Policy. This may also include details about your innovation you provide us through your Innovation Submission Form.

The following are the types of Personal Data We may collect from you:

- (a) First & Last Name;
- (b) Email Address;
- (c) Profession or occupation;
- (d) Academic or professional affiliation;
- (e) Phone number;
- (f) Country of residence;
- (g) Details of documents relating to IP protections filed by or granted to You, to the extent that such documents contain any personally identifiable information; and

We do not collect any personal information considered to be Sensitive Personal Data. However, please note that it is possible that the Government or any appropriate authority may categorize other types of Personal Information as Sensitive Personal Data/Information. In such cases, We will inform You of the same and obtain Your consent as, and if required. We would however reassert that your Personal Data does not include details about your innovation you submit to us. These details qualify as your Intellectual Property, and such information would be collected and processed in accordance with the Terms.

Cookies and tracking technologies

We may also collect certain Personal Data and non-personal information through cookies while You access the Portal. Cookies are text files to identify Your internet browser, store Your preferences, and to improve Your experience on the Portal.

We use cookies in order to improve our services provided to You. Please note that, some cookies We use are essential for some services to work, others are used to collect information of the use of the Portal so that the Portal can be more convenient and useful for You. Most web browsers automatically accept cookies, but, if You prefer, You can

usually modify your browser setting to decline cookies. However, please note that refusing a cookie may limit your access to Portal.

You are free to opt-in or opt-out to the use of cookies when You first visit the Portal by means of our Cookie Preference Form that will reflect on the home screen of our Portal. You can choose, at the time of opting in, for what purposes are the Cookies used. Consent, once provided, can be withdrawn at any time by altering Your cookie preferences in Your Portal. The retention period of cookies is limited and differs per cookie. Please be informed that disabling cookie collection through the Portal or changing Your consent may result in some features of the Portal not functioning properly and We will not be able to send customized and relevant communication or promotional messages to You. The cookies shall be governed by our Cookie Policy that is accessible at <https://www.bajaelectricals.com/privacy-policy/>.

Sources of collection

We collect and process Your Personal Information through the following sources:

- i. Information that may have been provided by You, collected during Our interaction with You, obtained from third-parties, including our affiliates, through publicly available sources, including databases, Government or its agencies; or
- ii. Personal Information collected by us using automated technologies like cookies which is governed by our Cookie Policy accessible at <https://www.bajaelectricals.com/privacy-policy/>.
- iii. If You telephone Us, We may also record and/or monitor calls for quality checks and staff training. Such recordings may also be used to help Us combat fraud.

(C) Purposes of collection and Legal Basis

We may collect and process Your Information for the purposes set out below. These purposes include:

Purpose of collection	Personal Data collected	Legal basis for processing
To process and arrive at a decision with regard to Your submission of the Innovations	Name, Email address, profession, nationality or occupation, academic or professional affiliation, phone number and country of residence	Consent
To contact You with regard to Your submissions of the Innovations	Name, Email address, phone number	Consent and Reasonable Purposes
To enable You to access the Portal to make submissions of Innovations, operate and improve the Portal to foster a positive user experience and to improve Our business as a whole and for related research	Name, Email address, profession or occupation, academic or professional affiliation, phone number and country of residence	Consent and Reasonable Purposes
To analyze data, tracking trends, building algorithms, databases, recommendations and engines	Name, Email address, profession or occupation, academic or professional affiliation, phone number and country of residence	Consent and Reasonable Purposes

For non-targeting reasons such as frequency capping, compliance, billing, ad reporting or delivery, market research or product development purposes	Name, Email address, phone number	Reasonable Purposes
To comply with applicable law, conduct audits, quality assessment procedures	Name, Email address, profession or occupation, academic or professional affiliation, phone number and country of residence	Compliance with law
To analyze use of our resources, troubleshooting problems, improving our products and services, respond to queries, communicate information to you, including notifications of promotions, alerts or changes or updates to the Portal	Name, Email address, phone number	Reasonable Purposes
To investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms, or as otherwise required by law	Name, Email address, profession or occupation, academic or professional affiliation, phone number and country of residence	Compliance with law and Vital Interest in emergent situations
To contact you by way of SMS, email and phone calls, from time to time to record your valuable feedback on our Products and Services, as they currently stand, and/or any potential Products and Services that may be offered in the future	Name, Email address, phone number	Consent and Reasonable Purposes

Where reasonably practical, required by applicable law or where We rely on Your consent, We will obtain Your consent prior to collecting or using Your Personal Information. The request for Your consent will be clear and specific and provide You with a reasonable basis on which You may make Your decision. We will make sure that You can provide Your consent in a clear and transparent manner. Your consent is voluntary and may always be revoked, for example, by contacting our representative in the manner indicated in later sections. As mentioned before, where Your consent is required, and You do not give Your consent, it may not be possible for You to use the Portal.

Legal basis for processing

Your Personal Information may be processed by Our Portal under different circumstances and under different lawful basis. The same is provided below for Your information:

- (a) Consent: We may use and process Your Personal Data where You have consented to such processing. We will obtain explicit consent with validation and authentication of Your identity, if and when we process Your Sensitive Personal Data (if any). Once You give Your consent, we may also process Your Personal Data for

purposes incidental to or connected with the specific purposes for which You have consented, to the extent permitted under applicable law.

You may withdraw Your consent at any time. You can let Us know by contacting Us at the contact details mentioned below. If You choose to withdraw Your consent, We may not be able to contact You or proceed with Your involvement in the ideas or Innovations or suggestions proposed by You.

- (b) Vital Interest in emergent situations: We may use Your Personal Information to reach to You if there are any urgent notices or other communications required to be made to You.
- (c) Compliance with applicable laws: We may process Your Personal Information wherever applicable law mandates Us to process certain data for compliance or other legal purposes, or where Your Personal Information or associated information is solicited by the Government or authorized agencies under applicable law.

By providing your email and phone number to Us, You are authorizing us, Our representatives and Our partners to communicate with You through various modes like call, email regarding any marketing / promotional offers offered by Us, irrespective of the fact that You have registered yourself under Do Not Disturb (“DND”) or Do Not Call (“DNC”) service, You are still authorizing us, Our representatives and Our partners to communicate with You for the abovementioned purposes. There is no DNC check required for a number You leave on Our Platform or with Our agents. If You wish to opt out of receiving non-essential communications such as promotional and marketing-related information regarding our Products and Services, please email us at the details provided below in the contact section.

Third party follow links:

Through the use of the Portal, You may access certain third party links to other services, which may, for example, require transmission of Personal Data or Sensitive Personal Data (if any) to third-parties which not owned or controlled by Us and We are not responsible for the privacy practices of those sites. We are not responsible for the collection or use of Personal Data in such applications or services provided by a third-party and recommend that You carefully review applicable terms for (and any integrity policy related to) such applications or services before You use them. If You have questions concerning a certain third party's use of Your Personal Data, please contact the third party directly.

(D) Sharing, disclosure and retention of Personal Data

We may disclose your Personal Information, as the case may be, to third parties in the manner and for the purposes specified below:

1. To Our affiliates or group companies for the purposes described in this Policy;
2. To Our third-party service providers who provide services such as website hosting, data analysis, proposal processing and related services, research, information technology and related infrastructure provision, email delivery, innovation and research, auditing, fraud detection and other services;
3. To third parties, to permit them to send you marketing communications, consistent with your choices if you have opted into such sharing;
4. Such data available in reports and other materials provided by You and/or Your company may be shared pursuant to an engagement with another business partner and/or a supplier.

We may also use and disclose Your Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, which may include laws outside Your country of residence, to respond to requests from public and government authorities, which may include authorities outside your country of residence, to cooperate with law enforcement or for other legal reasons; (b) to enforce Our terms and conditions; and (c) to protect Our rights, privacy, safety or property, and/or that of Our affiliates or subsidiaries, You or others.

In addition, we may use, disclose or transfer Your information, without consent, to a third party in the event of any corporate restructuring, reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Internally, your information will be accessible to and evaluated by Our Innovation Manager and Our Evaluation Committee members who will determine whether your innovation fulfills the criteria we have decided to partner with you. Otherwise, your information would be kept encrypted and would only be made available to entities to whom disclosure is necessary to fulfill the purposes you have consented to **Retention of Personal Data**.

We will only retain your Personal Data for as long as it is necessary to fulfil the purposes outlined in this Policy or the purposes of which You have otherwise been informed as permitted under applicable law. While the exact period may vary from person to person, this means that when You have consented to our processing of Your Personal Data, We will retain the data for as long as We process and take decisive action on Your submissions of the Innovations or until You withdraw Your consent. If You have revoked Your consent, We may nevertheless retain certain Personal Data for the period as permitted under applicable law as may be required in order for Us to meet our legal obligations and defend ourselves in legal disputes. We will redact or delete Your Sensitive Personal Data if you withdraw your consent, unless required to be retained by applicable laws. If We have not received Your consent for Processing, the Personal Data will only be retained to the extent We are permitted to do so by law.

(E) Storage and Cross-Border Transfer:

We may transfer or share Your Personal Data with third-parties situated in countries outside India that may have differing data protection laws. In such instances, we will make best efforts to ensure that the transfer your Personal Data is made to a country or with such appropriate safeguards necessary to secure the same level of data protection afforded under Indian law.

We do not collect any Sensitive Personal Data from You at the moment. However, should any information be classified sensitive, we will take appropriate measures to comply with applicable law, including, complying with legal requirements relating to conditions for or restrictions on transfer of sensitive personal data and local storage requirements.

(F) Your Rights regarding Personal Data

If you live anywhere in India, the law has various rights bestowed on You in relation to Your Personal Data. We will have to confirm Your identity, wherever applicable, to ensure that Your rights are being exercised appropriately. To exercise these rights, You will have to write to Us on the contact details given below.

Except in exceptional circumstances, We will respond to Your request within 30 (thirty) working days from the date We receive your email. You will be informed of these charges once You write to us. Please be informed that You have the following rights under applicable laws in your country. In rare cases, we may not be able to comply with your directions of exercise of your rights due to some practical or legal reasons. We will inform you appropriately if such a situation occurs. If you are not satisfied with our response to your queries, you also have the right to approach a competent authority to get your issues resolved.

1. **Confirmation and Access to Your Personal Information:** You have the right to obtain a confirmation whether Your Personal Information is being processed or has been processed and access a copy Your Personal Information that We hold in a standard form that will be easy and understandable. You also have a right to obtain a brief summary of processing activities undertaken by Us with respect to Your Personal Data.

In rare occasions We may not provide You with a copy of Your information in which case We will convey You this message with appropriate reasons. You also have the right to access in one place the identities of the data fiduciaries with whom Your Personal Data has been shared by Us together with the categories of Personal Data shared with them.

2. **Verify and rectify:** Accuracy is an important principle of data protection and You have the right to verify Your Information with Us and ask Us to rectify it if it is inaccurate. You can correct, complete and update Your name, address, contact details and other Personal Information You give Us.
3. **Nominating legal heirs and exercising rights:** You have the right to nominate a legal heir or a legal representative as Your nominee for exercising the rights relating to processing of Your Personal Data in the event of death or permanent disability.

You also have the right to exercise the right to be forgotten or to modify the terms of the Agreement with Us, in the event of death.

4. **Withdrawing Your consent:** You can always withdraw Your consent You have given Us. We will be bound to stop collecting or processing Your data We collect from You solely on basis of Your consent.

Also, we are legally permitted to continue collecting or processing Your Personal Data if we can rely on grounds other than consent to process Your Information, such as legal obligations for processing such information.

5. **Erasing Your Personal Information:** You have the right to get Your Information erased from our systems. Unless there is a reason that the law allows Us to use Your Personal Information for longer, We will take reasonable efforts to comply with Your request.
6. **Your right to port Your Information:** Where Your Personal Information is processed using automated means, You have the right to ask for a copy of information that We collect from You in a structured data file. We will provide this to You electronically in a structured, commonly used and machine-readable form.

You can also ask Us to send Your Personal Information directly to another data fiduciary, and We will do so if this is technically possible. We may not provide You with a copy of Your Personal Information if this concerns other individuals or We have another lawful reason to withhold that information.

7. **Your right to be forgotten:** You may also ask Us to restrict or prevent processing Your Personal Information in the following situations:
 - where You believe it is unlawful for Us to do so,
 - You have objected to its use or withdrawn Your consent and our assessment is pending or
 - Where Your data has served the purpose

In these situations, We may only process Your Personal Information whilst its processing is restricted if We have Your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

(G) Security Measures to safeguard Personal Data

We strive to work towards the security, integrity and privacy of Your Information and to protect Your Information against unauthorized disclosure, access or destruction to the extent reasonably possible by Us. We are in compliance with the reasonable security standards as prescribed by the applicable laws in India. Notwithstanding anything contained in this Policy or elsewhere, We shall not be held responsible for any loss, damage, or misuse of Your Information, if such loss, damage, or misuse takes place as a result of a Force Majeure Event (*as defined below*).

A "**Force Majeure Event**" shall mean any event that is beyond our reasonable control and shall include, without limitation, fire, flood, explosion, acts of God, civil commotion, strikes, insurrection, war, epidemic, pandemic, acts of government, computer hacking, software failure and storage device, computer crashes etc.

Breach of Personal Data

We will promptly, and not later than 72 (seventy-two) hours from such incident, report appropriate authorities about breach of any Personal Data processed by us, in accordance with applicable law. We will take necessary directions and remedial measures directed by such authority to prevent further loss of information or mitigate harm, as may be specified. We may also contact You to report such breaches to You based on directions issued by authorities under applicable law.

(H) Modifications & Grievance Redressal:

We reserve the right to change this Policy at any time, so please visit the Portal regularly to review our privacy statement. Any continued use of the Portal by You, following any such amendments to the Policy, will be deemed as an implicit acceptance of the Policy in its amended form. The Company retains the right at any time to deny or suspend access to all or part of the Portal to anyone who the Company believes has violated any condition of this Policy.

Grievance Redressal

If You have any questions about this Policy, the practices of the Company or your dealings with the Portal, You can contact Us using the information given here under to our Grievance Officer/ the Data Protection Officer.

We shall undertake all reasonable efforts to address your grievances/concerns and communicate to you with necessary steps at the earliest possible opportunity and at the latest within 1 (one) month from the date of receipt of your communication. You also note that You have a right to approach any authority empowered by law to make complaints of contraventions under applicable law.

Email Address:

For customer data related - privacy.officer@bajaelectricals.com

For website order related - response@bajaelectricals.com

For service related - consumercare@bajaelectricals.com

Phone - 022-41280000