



Document ID/Name	Privacy Policy of Hindalco Industries Ltd
Version	Dated – September, 2023 *Note: This Policy may be updated by the Company in its sole discretion, as and when required and shall be available on the Company’s online intranet portal/ website and may be made available through e-mail communication.

We, at Hindalco Industries Limited (**We, Us, Our, Hindalco, Company**) and our affiliates take data privacy seriously and are committed to protecting it. It is, therefore, important that we brief you about how Hindalco collects, processes, uses, and discloses information while running its business.

1. Scope

(a) This Privacy Policy (**Privacy Policy/ Policy**) explains the details of our collection, usage, purpose, sharing, and disclosure of data, including your personal data, that is collected or used by Us while conducting Our business. This Policy covers only data collected through the Site/s (our homepage www.hindalco.com, and related mobile applications, if any) and does not cover any other data collection or processing, without limitation, collection conducted offline, or through our products or services that do not link directly with this Policy, or by third-party sites that we may link to.

2. Collection of Personal Data

(a) By way of the following table, we seek to inform you of the data we collect from you through the Site/s, along with the specific identified purpose for the collection of such data. We will only require you to provide such personal data that is necessary for us to provide you with our services at your request.

(b) This will enable you to review our data collection practices, and provide us with your informed consent to the continuous collection, use and disclosure of your personal data, while offering our Site/ s to you.

Data We Collect	Specified Purpose for Collection
Data you provide to us	
Your name, organization, address, location, telephone, e-mail, fax number.	To process your queries, and for correspondence with you.

Username, password for Customer Relations Management Portal or Supplier Relations Management Portal.	To create a profile, secure access, and facilitate conversation between you and the Company.
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Page of 5

Your social media profiles, where you connect with us such as LinkedIn, Facebook, YouTube, and Instagram.	Personalization of service offerings and improvement of the Site/s.
Data we collect about you from our Site/s	
Your activity on the Site/ s (pages you access, view, URL time stamps).	To identify you, remember your actions on the Site/ s.
IP Address, device details, user location, device OS version and hardware.	Minimize your efforts to interact with us and provide seamless personalized experience on your device.

Data Collected from Third Parties. As the Site/ s allow you to interact with us, via social media plugins for LinkedIn, Facebook, YouTube, and, Instagram, we will collect such necessary information from these third parties, as may be required for your association with us on these platforms. Furthermore, you will be bound by the terms of use and privacy policies of these third parties, and we urge you to review and familiarize yourself with the policies of these websites, before continuous interaction with them.

- (c) **Cookies.** We also use cookies to enhance your experience, and customize it, for you. Cookies are used to support critical functionality as well as track usage information that lets us improve our performance. For more information on how we deploy cookies, please refer to our Cookie Policy.

3. Legal Grounds for Processing your Personal Information

- (a) We process your personal data on the basis of your consent, which we may seek from you. Alternatively, we may further process your personal data, without your prior consent, for certain legitimate uses namely, and as permitted in law:

- for the specified purpose for which you have voluntarily provided your data;
- fulfilling an obligation to State instrumentalities to disclose processing information about a certain user;
- compliance with any judgment, decree under any law for the time being in force in India;
- protect your or another person's vital interests, involving a (i) threat to the life or immediate threat to the health of the individual, (ii) medical treatment or health services to any individual during an epidemic, outbreak of disease, or any other threat to public health; (iii) provide assistance during a disaster.

4. Other Use cases

- (a) In addition to the foregoing, we may also use your data, in the following manner:

Page 2 of 5

- combine the types of data collected, to the extent permissible in law, and as consented by you. conduct market analysis and similar research to enable us to make business decisions;
- if you have provided us with your professional resume, we may process the same for consideration of opportunities within the Company.

5. Sharing and Transfer of Data

- (a) We will not share your personal data with third parties, except (a) to our subsidiaries, affiliates, and service providers to fulfill product orders or deliver services, or otherwise to fulfill a contractual obligation to you; (b) to service providers who act on our behalf and under our instructions to perform certain functions (e.g., IT companies, background check, legal, financial and other advisors); (c) as required by applicable law, such as to co-operate with law enforcement agencies or upon receipt of a court order; or (d) to courts and public authorities to protect you, us, or third parties from harm, including fraud or instances where somebody's physical safety is at risk. Disclosure of information shall be in accordance with this Policy and the applicable laws. Our service providers are obliged to comply with this Policy and adhere to confidentiality requirements for processing your personal information.
- (b) In the event of a merger, acquisition, or other reorganization or sale of our business or assets, we may share or transfer your data, where the recipient will be required to use the data in accordance with this Policy.

6. Data Retention

- (a) Depending on the nature of the data you provide to us, and the context in which such information is furnished to us, we may have differential timelines. We keep data for at least as long as required/permitted by applicable law.
- (b) We may further retain your data till the period that is required for the purposes of us meeting your requests on our Site/ s, and in compliance with the applicable laws, statutory requirements.

7. Duties of Data Principals

- (a) Every user of this Site/s must comply with the provisions of all applicable laws for the time being in force while exercising rights under this Privacy Policy. The users must ensure not to:
- impersonate another person;
 - suppress any material information while corresponding with us;
 - register a false or frivolous grievance or complaint with the Company; and,
 - furnish information which is not verifiably authentic, while exercising the right to correction or erasure under the applicable laws.

8. Data Principal Rights

- (a) You may access, correct, and/or erasure your information by accessing your accounts or profiles on our Site/s.

- (b) You shall have the right to nominate an individual, who will have the same rights as you, in the event of your death or incapacity to exercise your rights under this Privacy Policy.
- (a) You shall have the right to seek grievance redressal in respect of any act or omission on our part. However, if you are not satisfied with the response of our Grievance Officer, and desire to appeal their decision, you may reach out to the concerned representative of the Data Protection Board of India.
- (c) To exercise rights applicable to you, you must write to us at Geetika.anand@adityabirla.com and raise a request for the specified right. Kindly ensure you use appropriate subjects to mention the right (e.g., data correction or data erasure) while raising all such requests, this would help us process your requests in a faster and more efficient manner.
- (d) We will adhere to the timelines prescribed within the law, to respond to you, address your concerns.

9. Cross-Border Transfers

- (a) Your personal information may be transferred to and stored in locations outside India, and to such territories in which our affiliates and subsidiaries are incorporated in and work out of. We will do this only when the destination jurisdictions that have not been restricted by the government of India, and shall ensure that an adequate and appropriate level of protection continues to be afforded to the treatment of your personal data.
- (b) Our lawful basis for such a transfer will be either based on consent or one of the safeguards permissible by laws.

10. Information Security

- (a) We take commercially reasonable technical, physical, and organizational steps to safeguard any data you provide to us, to protect it from unauthorized access, loss, misuse, or alteration. Although we take reasonable security precautions, no computer system or transmission of information can ever be completely secure or error-free; kindly note that accidents which are out of our reasonable control and/or influenced/triggered by the outside environment are likely.
- (b) In addition, we urge you to use your passwords, ID numbers, or similar individual data associated with your use of the Site/ s responsibly, carefully, and with diligence.

11. Children's Privacy

- (a) Our services are not directed at minors. We do not knowingly permit any person who is under the age 18 (eighteen) years of age to register with the services or to provide their personal data. If we become aware that any personal data of persons less than 18 (eighteen) years of age has been collected on the website without verifiable parental consent, then we will take the appropriate steps to delete any such information and notify the parent.
- (b) Should a parent or guardian have reasons to believe that a minor has provided us with personal information without their verifiable consent, please write to us at Geetika.anand@adityabirla.com to request the deletion of your child's data from the Site/ s.

12. Changes to our Privacy Policy

- (a)** We reserve the right to change this Policy from time to time and in our sole discretion. We will alert you, where feasible, to the changes and the date on which they were made effective. Any significant change will be communicated to you, on your registered e-mail address, as available with us, on the date of its effectiveness.
- (b)** When you visit the Site/ s, you accept the version of this Policy in effect at that time. We recommend that you periodically revisit the Site/ s to take note of any revisions made.