



Tata BlueScope Steel Pvt. Ltd.

Data Privacy Policy

Ver. 1.1

Ethics Office
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Summary of Changes Made to The Policy Document

Version No.	Version Date	Prepared By	Approved by	Affected Section & Description of Change
1.0	2 nd July 2017	Minaakshi Nayyar	Riten Choudhury	<ul style="list-style-type: none"> Document created
1.1	13 th June 2022	Nayana Rokade	Anoop Kumar Trivedi	<ul style="list-style-type: none"> Policy updated in line with the policy of Tata Steel Ltd. Detailing of Data Privacy principles into Annexure 1.

Purpose

The purpose of this policy is to maintain the privacy of and protect the sensitive personal information of employees, contractors, vendors, interns, associates, customers, and business partners of Tata BlueScope Steel Private Limited (hereafter referred to as "TBSPL" or "the company"). and to ensure the compliance with laws and regulations applicable to the company.

The policy explains how the company collects, uses, stores, discloses or otherwise processes sensitive personal information and describes the right the data subjects have with respect to their personal data.

Scope and Applicability

This Policy applies to all TBSPL employees, contractors, vendors, interns, associates, customers, and business partners who receive sensitive personal information from TBSPL, who have access to sensitive personal information collected or processed by TBSPL, or who provide sensitive personal information to TBSPL, regardless of geographic location.

All employees of TBSPL are expected to support the privacy policy and principles when they collect and / or handle sensitive personal information or are involved in the process of maintaining or disposing of sensitive personal information. This policy lays down the rules to successfully meet the company's commitment towards data privacy.

All business partner firms and any Third-Party working with or for TBSPL, and who have or may have access to sensitive personal information, will be expected to read, understand and comply with this policy. No Third Party may access sensitive personal information held by the company without having first entered into a confidentiality agreement.

Definitions

Data Subject: A data subject who is the subject of sensitive personal information /data.

Personal data or Personally Identifiable Information (PII): PII is any information about an individual (the data subject) which may be

- any information/ data that can be used to distinguish or capable of identifying an individual's identity;
- any other information/ data that is linked or linkable to an individual Examples included but not limited to: Name, Address, Date of birth, medical records, pan card, Aadhar card, passport, sexual orientation etc.

Sensitive Personal Information/ Data (SPI): Sensitive personal information/ data means personal data consisting of information but not limited to the following attributes of the data subject:

- password;
- financial information such as bank account or credit card or debit card or other payment instrument details;
- physical, physiological and mental health condition;
- sexual orientation;
- medical records and history;
- genetic or biometric information;
- racial and ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- any detail relating to the above clauses as provided to body corporate for providing service; and
- any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise: Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.

Third Party: All external parties' viz. contractors, interns, trainees, vendors etc. who have access to TBSPL information assets and/or information systems.

Policy Statement

TBSPL is committed to providing the highest level of protection regarding the processing of our employees', vendors' and clients'/customers' personal data based on applicable data protection laws and regulations.

Personal data comprises all the details that the company collects and processes directly or indirectly about an individual, for instance information about individual identity and contact details (such as name, email-ID, contact number), including information received from third parties and information collected through use of websites, cookies or other similar tools. TBSPL will first and foremost comply with local law where it exists.

Data protection and security guidelines: Anyone collecting personal and customer information must fairly and lawfully

process it, process it only for limited, specifically stated purposes, use the information in a way that is adequate, relevant and not excessive, use the information accurately, keep the information on file no longer than absolutely necessary, process the information in accordance with the legal rights, keep the information secure and never transfer the information outside the country without adequate protection

Processing Personal Data

TBSPL may process personal data where such relevant personally identifiable information is required to be processed for legitimate purposes as follows, but not limited to:

- Processing applications for products and services;
- Providing products and services; (It is not feasible for an organization to provide product / service without processing)
- Monitoring and improving our website and its content;
- Conducting market research and surveys with the aim of improving our products and services;
- Sending information about our products and services for marketing purposes and promotions;
- Complying with applicable local or foreign law, regulation, policy, voluntary codes, directive, judgement or court order, as well as any contractual obligation pursuant to agreements between TBSPL and any authority, regulator or enforcement agency or body or any request coming from said entities.
- Establishing, exercising or defending legal rights in connection with legal proceedings (including any prospective legal proceedings) and seeking professional or legal advice in relation to such legal proceedings.
- Surveillance of premises. (Video Recording)

TBSPL processes personal data for the performance of the contracts/agreements concluded with data subjects, compliance with applicable legal or regulatory obligations or legitimate interests to provide data subjects with adequate and qualitative products and services and to prevent against any excessive risk. Where providing the data is optional, and data subjects choose not to share personal data, features like personalization that use such data will not work for them.

Access to Personal Data

Personal data processed by TBSPL will only be accessible by a limited list of recipients on a need-to-know basis or where required by law. Our policy does not apply to third-party websites where our online advertisements are displayed, nor to linked third-party websites which we do not operate or control.

To the extent permitted by law, TBSPL may record and monitor the communications of data subjects to ensure compliance with our legal and regulatory obligations and our internal policies.

Data Privacy Principles

This Policy describes generally acceptable privacy principles (GAPP) for the protection and appropriate use of sensitive personal information at TBSPL. These principles shall govern the use, collection, protection, disposal and transfer of sensitive personal information, except as specifically provided by this Policy or as required by applicable laws. The principles are detailed out in Annexure 1.

1. Management

The owner for the Data Privacy Policy shall be the Ethics Counsellor (EC) together with designated Compliance Officer (CO) of the Company.

2. Notice:

TBSPL shall provide data subjects with notice about how it collects, uses, retains, protects and discloses sensitive personal information about them.

3. Choice and Consent:

TBSPL shall give data subjects the choices and obtain their written consent regarding how it collects, uses, and discloses their sensitive personal information.

4. Collection:

TBSPL shall collect personal information from data subjects only for the lawful purposes identified in the privacy notice / SoW / contract / agreements and only to provide or receive requested product or service. TBSPL shall also collect, retain and transfer sensitive personal information to meet any requirement of the applicable statute or to comply with any order, instructions, directions etc. of the judicial, quasi-judicial, local administration, police or any authority duly empowered to collect such sensitive personal information.

5. Use, Retention and Disposal:

TBSPL shall only use sensitive personal information that has been collected for the lawful purposes identified in the privacy notice / SoW / contract/ agreements and in accordance with the consent that the data subject shall provide. TBSPL shall not retain sensitive personal information longer than is necessary to fulfil the lawful purposes for which it was collected and to maintain reasonable business records. TBSPL shall dispose the sensitive personal information once it has served its intended lawful purpose or as specified by the data subject/s. TBSPL or any authorized person acting on behalf of TBSPL has no responsibility for anything whatsoever, direct or indirect, if sensitive personal information is found to be misleading, false and inaccurate.

6. Access:

TBSPL shall allow data subjects to make inquiries regarding the sensitive personal information about them, that TBSPL shall hold and, when appropriate, shall provide access to their sensitive personal information for review, and/or update.

7. Disclosure to Third Parties:

TBSPL shall disclose sensitive personal information to Third Parties /partner firms only for lawful purposes identified in the privacy notice / SoW / contract/ agreements. TBSPL shall disclose sensitive personal information in a secure manner, with assurances of protection by those parties, according to the contracts, laws and other segments, and, where needed, with consent of the data subject. TBSPL may require disclosing sensitive personal information under any applicable statute or to comply any with order, instructions, directions etc. of the judicial, quasi-judicial, local administration, police or any authority duly empowered in this behalf.

8. Security for Privacy:

TBSPL shall protect sensitive personal information from unauthorized access, data leakage and misuse. When using external service providers acting as processors, we require that they adhere to the same standards as us. Regardless of where the personal information is transferred or stored, we take all steps reasonably necessary to ensure that personal data is kept secure.

9. Quality:

TBSPL shall take steps to ensure that sensitive personal information in its records is accurate and relevant to the lawful purposes for which it was collected.

10. Monitoring and Enforcement:

TBSPL shall monitor compliance with its privacy policies and establish the processes to address inquiries, complaints and disputes. Any concern pertaining data privacy shall be addressed to the CO or EC at ethicscounselor@tatabluescopesteel.com

Rights of Data subject/s:

TBSPL shall provide individuals with the right to control their sensitive personal information, which includes the right to access, modify, erase, restrict, transmit, or object to certain uses of their sensitive personal information and for withdrawal of earlier given consent to the notice.

Social Media

TBSPL operates channels, pages and accounts on some social media sites to inform, assist and engage with employees, vendors and clients/customers. The company monitors and records comments and posts made on these channels about TBSPL in order to improve its products and services.

Please note that following information should never be communicated to TBSPL through such social media sites:

- confidential personal data, including any information regarding your financial situation, bank account details, transactions, etc.
- sensitive personal data including (i) 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 sensitive personal data such as criminal convictions and offences and national identification number; and
- excessive, inappropriate, offensive or insulting information towards individuals.

TBSPL is not responsible for any information posted on those sites other than the information posted by its employees on its behalf. TBSPL is only responsible for its own use of the personal data received through such sites.

Amendment

This policy shall be reviewed periodically for updates in-line with any major changes within the company's operating environment, business ecosystem, applicable statute etc. or on recommendations provided by internal/ external auditors. Any changes made to this policy shall be communicated to all stakeholders through appropriate means. The use of the TBSPL websites and any products and services supplied are subject to our Terms and Conditions.



Anoop Kumar Trivedi

Managing Director

Annexure 1: Principles of Data Privacy

1. Management

The EC shall be responsible for maintenance and accuracy of this policy. Any queries regarding the implementation of this Policy shall be directed to the CO. The CO shall address the privacy related incidents and breaches. Such concerns will also be reported by the EC on quarterly basis to management. The designated Compliance Officer is the Legal Head and Company Secretary or any other officer authorized by the Company from time to time and displayed on the Company's website from time to time.

2. Notice

Notice shall be made readily accessible and available to data subjects before or at the time of collection of sensitive personal information or otherwise, notice shall be provided as soon as practical thereafter. Notice shall be displayed clearly and conspicuously and shall be provided through online (e.g. by posting it on the intranet portal, website, sending mails, newsletters, etc.) and / or offline methods (e.g. through posts, couriers, etc.). All the web sites (including Intranet portals), and any product or service that collects sensitive personal information internally, shall have a privacy notice. In case of any cross-border transfer of sensitive personal information, the data subjects shall be informed by a notice sufficiently prior to the transfer and the data subjects shall have right to not give consent for the said transfer.

Privacy notices may include:

- the company's operating jurisdictions; Third Parties involved; business segments and affiliates; lines of business; locations;
- types of sensitive personal information collected; sources of sensitive personal information; who is collecting the sensitive personal information, including contact information;
- the purpose of collecting the sensitive personal information;
- assurance that the sensitive personal information will be used only for the purpose identified in the notice and only if the implicit and / or explicit consent is provided unless a law or regulation specifically requires otherwise;
- any choices the data subject/s have regarding the use or disclosure of the sensitive personal information;
- the process data subject/s shall follow to exercise the choices;
- the process for a data subject to change contact preferences and ways in which the consent is obtained.
- collection process and how the sensitive personal information is collected; how the information is used including any onward transfer to Third Parties;
- retention and disposal process for sensitive personal information; assurance that the sensitive personal information to be retained only as long as necessary to fulfill the stated lawful purposes, or for a period specifically required by law or regulation and will be disposed-off securely or made anonymous post the identified purpose is completed;
- process of accessing sensitive personal information; the costs associated for accessing sensitive personal information

(if any); process to update / correct the sensitive personal information; the resolution of disagreements related to sensitive personal information; how the sensitive personal information is protected from unauthorized access or use;

- how users will be notified of any changes made to privacy notice;
- disclosure process for Third Parties; the assurance that the sensitive personal information is disclosed to Third Parties only for the lawful purpose identified; the remedial actions in place for any misuse of sensitive personal information by the Third Parties;
- security measures in place to protect the sensitive personal information; ways of maintaining quality of sensitive personal information;
- monitoring and enforcement mechanisms in place; description of the complaint channels available to data subjects; how the internal personnel, key stakeholders and the customers can contact the Company related to any privacy complaints or breaches; relevant contact information and / or other reporting methods through which the complaints and/or breaches could be registered;
- Consequences of not providing the requested information.

3. Choice and Consent

Choice refers to the options that the data subjects are offered regarding the collection and use of their sensitive personal information. Consent refers to their agreement to the collection and use, often expressed by the way in which they exercise a choice option.

- TBSPL shall establish systems for the collection and documentation of data subject/s consents to the collection, processing, and/or transfer of sensitive personal information and data.
- Data subjects shall be informed about the choices available to them with respect to the collection, use, and disclosure of sensitive personal information.
- Consent shall be obtained (in writing or electronically) from the data subjects before or at the time of collecting sensitive personal information or as soon as practical thereafter.
- The changes to a data subject's preferences shall be managed and documented. Consent or withdrawal of consent shall be documented appropriately.
- The choices shall be implemented in a timely fashion and respected. If sensitive personal information is to be used for the purposes not identified in the notice / SoW / contract/ agreements at the time of collection, the new purpose shall be documented, the data subject shall be notified, and consent shall be obtained prior to such new use or purpose.
- Data subject represents and warrants that sensitive personal information furnished is true and accurate and Data subject shall indemnify and keep indemnified TBSPL against any losses, claims, damages, costs, proceedings, liabilities arising out of or in connection with false, misleading and inaccurate sensitive personal information furnished by Data subject.
- TBSPL shall review the privacy policies of the Third Parties and types of consent of Third Parties before accepting

sensitive personal information from Third-Party data sources.

4. Collection of Sensitive Personal Information

Sensitive personal information may be collected online or offline. Regardless of the collection method, the same privacy protection shall apply to all sensitive personal information.

- Sensitive Personal information shall not be collected unless either of the following is fulfilled:
 - the data subject/s has provided a valid, informed and free consent ;
 - processing is necessary for the performance of a SOW/agreement/contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
 - processing is necessary for compliance with the company's legal obligation;
 - processing is necessary in order to protect the vital interests of the data subject/s; or
 - processing is necessary for the performance of a task carried out in the public interest
- Data subjects shall not be required to provide more sensitive personal information than is necessary for the provision of the product or service that data subject has requested or authorized or for the purpose specified in the notice.
- Sensitive personal information shall be de-identified when the purposes of data collection can be achieved without personally identifiable information, at reasonable cost.
- When using any authorized third party to collect sensitive personal information on the behalf of TBSPL, it shall ensure that the third party comply with the privacy requirements of TBSPL as defined in this Policy.
- TBSPL shall at minimum, annually review and monitor the sensitive personal information collected, the consent obtained and the notice / SoW / contract/ agreement identifying the purpose.
- The project team/support function shall obtain approval from the IT Security team of the company before adopting the new methods for collecting, usage, retention and transfer of sensitive personal information electronically.
- TBSPL shall review the privacy policies and collection methods of Third-Parties before accepting sensitive personal information from Third-Party data sources.

5. Use, Retention and Disposal

- Sensitive personal information may only be used for the purposes identified in the notice / SoW / contract/ agreements and only if the data subject/s has given consent. The consent is dispensed with if sensitive personal information is used for fulfilling TBSPL's legal obligation;
- Sensitive personal information shall be retained for as long as necessary for lawful purposes identified in the notice / SoW / contract/ agreements at the time of collection or subsequently authorized by the data subjects.
- When the use of sensitive personal information is no longer necessary for lawful business purposes, a method shall be in place to ensure that the sensitive personal information is destroyed in a manner sufficient to prevent unauthorized

access to that sensitive personal information or is de-identified in a manner sufficient to make the data non-personally identifiable.

- TBSPL shall have a documented process to communicate changes in retention periods of sensitive personal information required by the business to the data subjects who are authorized to request those changes.
- Sensitive Personal information shall be erased if their storage violates any of the data protection rules or if knowledge of the data is no longer required by TBSPL or for the benefit of the data subject. Additionally, TBSPL has the right to retain the sensitive personnel information for legal and regulatory purpose and as per applicable data privacy laws.
- TBSPL shall perform an internal audit on an annual basis to ensure that sensitive personal information collected is used, retained and disposed-off in compliance with the company's data privacy policy.

6. Access

- TBSPL shall establish a mechanism to enable and facilitate exercise of data subject's rights of access, blockage, erasure, opposition, rectification, and, where appropriate or required by applicable law, a system for giving notice of inappropriate exposure of sensitive personal information.
- Data subjects shall be entitled to obtain the details about their own sensitive personal information upon a request made and set forth in writing to EC or CO.
- The data subjects shall have the right to require TBSPL to correct or supplement erroneous, misleading, outdated, or incomplete sensitive personal information.
- TBSPL may be allowed by law, in particular in case of excessive or manifestly unfounded request, to charge a fee for fulfilling such request, subject to applicable conditions.
- TBSPL shall provide information on action taken on a request pertaining to the Data Subject Rights without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, considering the complexity and number of the requests. TBSPL shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

7. Disclosure to Third Parties

- Data Subject shall be informed in the privacy notice / SoW / contract/ agreement, if sensitive personal information shall be disclosed to Third Parties / partner firms, and it shall be disclosed only for the purposes described in the privacy notice / SoW / contract/ agreements and for which the data subject has provided consent.
- Sensitive Personal information of data subjects may be disclosed to the Third Parties / partner firms only for reasons consistent with the purposes identified in the notice / SoW / contract/ agreements or other purposes authorized by law.
- TBSPL shall notify the data subjects prior to disclosing sensitive personal information to Third Parties / partner firms for purposes not previously identified in the notice / SoW / contract/ agreements.

- TBSPL shall communicate the privacy practices, procedures and the requirements for data privacy and protection to the Third Parties / partner firms.
- The Third Parties shall sign a NDA (Non-Disclosure Agreement) with TBSPL before any sensitive personal information is disclosed to the Third Parties partner firms. The NDA shall include the terms on non-disclosure of customer information.

Obligations for Sub-processor:

Where a processor (vendor or third party acting on behalf of TBSPL's data processor) engages another processor (Sub-processor) for carrying out specific processing activities on behalf of TBSPL (controller), the same data protection obligations as set out in the contract or other legal act between TBSPL and the processor shall be imposed on the Sub-processor by way of a contract or other legal act under Union or Member State law, in particular providing sufficient guarantees to implement appropriate technical and compliance measures in such a manner that the processing will meet the requirements of the applicable law. Where the Sub-processor fails to fulfil its data protection obligations, the initial processor (relevant vendor or third party acting on behalf of TBSPL's data processor) shall remain fully liable and keep indemnified TBSPL for the performance of that Sub-processor's obligations.

8. Security

- Information security policy and procedures shall be documented and implemented to ensure reasonable security for sensitive personal information collected, stored, used, and disposed by TBSPL.
- Information asset labelling and handling guidelines shall include controls specific to the storage, retention and transfer of sensitive personal information.
- Management shall establish procedures that maintain the logical and physical security of sensitive personal information.
- Management shall establish procedures that ensure protection of sensitive personal information against accidental disclosure due to natural disasters and environmental hazards.
- Incident response protocols are established and maintained in order to deal with incidents concerning sensitive personal information and data or privacy practices.
- IT team shall exercise periodically the review of information security safeguards and in-built mechanism for the collection, use, protection and transfer of sensitive personal information as envisaged in this policy.

9. Quality

- TBSPL shall maintain data integrity and quality, as appropriate for the intended purpose of sensitive personal information /data collection and use and also ensure that data is reliable, accurate, complete and current.
- For this purpose, the Grievance Officer and IT Security team shall have systems and procedures in place to ensure that sensitive personal information collected is accurate and complete for the lawful business purposes for which it is to be used.

- TBSPL shall perform an annual assessment on the sensitive personal information collected to check for accuracy, completeness and relevance of the sensitive personal information.

10. Monitoring and enforcement

A. Dispute Resolution and Recourse

- TBSPL shall perform a periodic review of all the complaints related to data privacy to ensure that all the complaints are resolved in a timely manner and resolutions are documented and communicated to the data subjects.
- An escalation process for unresolved complaints and disputes which shall be designed and documented.
- Communication of privacy incident / breach reporting channels and the escalation matrix shall be provided to all the data subjects.
- Data subjects can also communicate their grievances through Whistle Blower mechanism.

B. Dispute Resolution and Escalation Process for Employees

Employees with inquiries or complaints about the processing of their sensitive personal information shall first discuss the matter with EC or CO.

C. Dispute Resolution and Escalation Process for Customer / Third Party

Customers / Third Party with inquiries or complaints about the processing of their sensitive personal information shall bring the matter to the attention of the EC in writing and CO shall resolve the same as per applicable laws and rules thereunder.