

## **PRIVACY POLICY**

THIS PRIVACY POLICY IS AN ELECTRONIC RECORD IN THE FORM OF AN ELECTRONIC CONTRACT FORMED UNDER THE INFORMATION TECHNOLOGY ACT, 2000 AND THE RULES MADE THEREUNDER AND THE PROVISIONS PERTAINING TO ELECTRONIC DOCUMENTS / RECORDS IN VARIOUS STATUTES AS AMENDED FROM TIME TO TIME. THIS PRIVACY POLICY DOES NOT REQUIRE ANY PHYSICAL, ELECTRONIC OR DIGITAL SIGNATURE.

THIS PRIVACY POLICY IS A LEGALLY BINDING DOCUMENT BETWEEN YOU AND WELSPUN (BOTH TERMS DEFINED BELOW). THE TERMS OF THIS PRIVACY POLICY WILL BE EFFECTIVE UPON YOUR ACCEPTANCE OF THE SAME (DIRECTLY OR INDIRECTLY IN ELECTRONIC FORM, BY CLICKING ON OR BY THE USE OF THE WEBSITE OR BY OTHER MEANS) AND WILL GOVERN THE RELATIONSHIP BETWEEN YOU AND WELSPUN FOR YOUR USE OF THE WEBSITE (DEFINED BELOW).

THIS DOCUMENT IS PUBLISHED AND SHALL BE CONSTRUED IN ACCORDANCE WITH THE PROVISIONS OF THE INFORMATION TECHNOLOGY (REASONABLE SECURITY PRACTICES AND PROCEDURES AND SENSITIVE PERSONAL DATA OF INFORMATION) RULES, 2011 UNDER INFORMATION TECHNOLOGY ACT, 2000 AS AMENDED FROM TIME TO TIME; THAT REQUIRE PUBLISHING OF THE PRIVACY POLICY FOR COLLECTION, USE, STORAGE AND TRANSFER OF SENSITIVE PERSONAL DATA OR INFORMATION.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY USING THE WEBSITE, YOU INDICATE THAT YOU UNDERSTAND, AGREE AND CONSENT TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT USE THIS WEBSITE.

By providing us your Information or by making use of the facilities provided by the Website, You hereby consent to the collection, storage, processing and transfer of any or all of Your Personal Information and Non-Personal Information by Welspun as specified under this Privacy Policy. You further agree that such collection, use, storage and transfer of Your Information shall not cause any loss or wrongful gain to you or any other person.

Welspun Corp Ltd. and its subsidiaries and affiliates and Associate Companies (individually and/or collectively, "Welspun") is/are concerned about the privacy of the data and information of users (including sellers and buyers/customers whether registered or non-registered) accessing, offering, selling or purchasing products or services on Welspun's websites, mobile sites or mobile applications ("Website") on the Website and otherwise doing business with Welspun.

The terms "We" / "Us" / "Our" individually and collectively refer to each entity being part of the definition of Welspun and the terms "You" / "Your" / "Yourself" refer to the users. This Privacy Policy is a contract between You and the respective Welspun entity whose Website You use or access or You otherwise deal with. This Privacy Policy shall be read together with the respective Terms Of Use or other terms and condition of the respective Welspun entity and its respective Website or nature of business of the Website.

Our privacy policy is subject to change at any time without notice. To make sure you are aware of any changes, please review this policy periodically.

By visiting this Website you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree please do not use or access our Website.

By mere use of the Website, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the Terms of Use.

## **1. Collection of Personally Identifiable Information and other Information**

When you use our Website, we collect and store your personal information which is provided by you from time to time. Our primary goal in doing so is to provide you a safe, efficient, smooth and customized experience. This allows us to provide services and features that most likely meet your needs, and to customize our Website to make your experience safer and easier. More importantly, while doing so we collect personal information from you that we consider necessary for achieving this purpose.

In general, you can browse the Website without telling us who you are or revealing any personal information about yourself. Once you give us your personal information, you are not anonymous to us. Where possible, we indicate which fields are required and which fields are optional. You always have the option to not provide information by choosing not to use a particular service or feature on the Website. We may automatically track certain information about you based upon your behavior on our Website. We use this information to do internal research on our users' demographics, interests, and behavior to better understand, protect and serve our users. This information is compiled and analysed on an aggregated basis. This information may include the URL that you just came from (whether this URL is on our Website or not), which URL you next go to (whether this URL is on our Website or not), your computer browser information, and your IP address.

We use data collection devices such as "cookies" on certain pages of the Website to help analyse our web page flow, measure promotional effectiveness, and promote trust and safety. "Cookies" are small files placed on your hard drive that assist us in providing our services. We offer certain features that are only available through the use of a "cookie".

We also use cookies to allow you to enter your password less frequently during a session. Cookies can also help us provide information that is targeted to your interests. Most cookies are "session cookies," meaning that they are automatically deleted from your hard drive at the end of a session. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on the Website and you may be required to re-enter your password more frequently during a session.

Additionally, you may encounter "cookies" or other similar devices on certain pages of the

Website that are placed by third parties. We do not control the use of cookies by third parties.

If you choose to buy on the Website, we collect information about your buying behaviour.

If you transact with us, we collect some additional information, such as a billing address, a credit / debit card number and a credit / debit card expiration date and/ or other payment instrument details and tracking information from cheques or money orders.

If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Website, we may collect such information into a file specific to you.

We collect personally identifiable information (email address, name, phone number, credit card / debit card / other payment instrument details, etc.) from you when you set up a free account with us. While you can browse some sections of our Website without being a registered member, certain activities (such as placing an order) do require registration. We do use your contact information to send you offers based on your previous orders and your interests.

## **2. Use of Demographic / Profile Data / Your Information**

We use personal information to provide the services you request. To the extent we use your personal information to market to you, we will provide you the ability to opt-out of such uses. We use your personal information to resolve disputes; troubleshoot problems; help promote a safe service; collect money; measure consumer interest in our products and services, inform you about online and offline offers, products, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our terms and conditions; and as otherwise described to you at the time of collection.

In our efforts to continually improve our product and service offerings, we collect and analyse demographic and profile data about our users' activity on our Website.

We identify and use your IP address to help diagnose problems with our server, and to administer our Website. Your IP address is also used to help identify you and to gather broad demographic information.

We will occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like zip code, age, or income level). We use this data to tailor your experience at our Website, providing you with content that we think you might be interested in and to display content according to your preferences.

### **Cookies**

A "cookie" is a small piece of information stored by a web server on a web browser so it can be later read back from that browser. Cookies are useful for enabling the browser to remember

information specific to a given user. We place both permanent and temporary cookies in your computer's hard drive. The cookies do not contain any of your personally identifiable information.

**You hereby represent to Welspun that:**

1. the Information you provide to Welspun from time to time is and shall be authentic, correct, current and updated and You have all the rights, permissions and consents as may be required to provide such Information to Welspun.
2. Your providing the Information to Welspun and Welspun's consequent storage, collection, usage, transfer, access or processing of the same shall not be in violation of any third party agreement, laws, charter documents, judgments, orders and decrees.
3. Welspun and each of Welspun entities officers, directors, contractors or agents shall not be responsible for the authenticity of the Information that You or any other user provide to Welspun. You shall indemnify and hold harmless Welspun and each of Welspun entities officers, directors, contracts or agents and any third party relying on the Information provided by You in the event You are in breach of this Privacy Policy including this provision and the immediately preceding provision above.
4. Your Information will primarily be stored in electronic form however certain data can also be stored in physical form. We may enter into agreements with third parties (in or outside of India) to store or process your information or data. These third parties may have their own security standards to safeguard your information or data and we will on commercial reasonable basis require from such third parties to adopt reasonable security standards to safeguard your information / data.

**3. Sharing of personal information**

We may share personal information with our other corporate entities and affiliates. These entities and affiliates may market to you as a result of such sharing unless you explicitly opt-out.

We may disclose personal information to third parties. This disclosure may be required for us to provide you access to our Services, to comply with our legal obligations, to enforce our User Agreement, to facilitate our marketing and advertising activities, or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to our Services. We do not disclose your personal information to third parties for their marketing and advertising purposes without your explicit consent.

We may disclose personal information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal process. We may disclose personal information to law enforcement offices, third party rights owners, or others in the good faith belief that such disclosure is reasonably necessary to:

enforce our Terms or Privacy Policy; respond to claims that an advertisement, posting or other content violates the rights of a third party; or protect the rights, property or personal safety of our users or the general public.

We and our affiliates will share / sell some or all of your personal information with another business entity should we (or our assets) plan to merge with, or be acquired by that business entity, or re-organization, amalgamation, restructuring of business. Should such a transaction occur that other business entity (or the new combined entity) will be required to follow this privacy policy with respect to your personal information.

#### **4. Links to Other Sites**

Our Website links to other websites that may collect personally identifiable information about you. Welspun is not responsible for the privacy practices or the content of those linked websites.

#### **5. Security Precautions**

Our Website has stringent security measures in place to protect the loss, misuse, and alteration of the information under our control. Whenever you change or access your account information, we offer the use of a secure server. Once your information is in our possession we adhere to strict security guidelines, protecting it against unauthorized access.

#### **6. Advertisements**

We use third-party advertising companies to serve ads when you visit our Website. These companies may use information (not including your name, address, email address, or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you.

#### **7. Consent**

By using the Website and/ or by providing your information, you consent to the collection and use of the information you disclose on the Website in accordance with this Privacy Policy, including but not limited to Your consent for sharing your information as per this privacy policy.

If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

#### **8. Grievance Officer**

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below:

Chief Information Officer

7th Floor, Welspun House, Kamala Mills Compound,

Senapati Bapat Marg, Lower Parel (W), Mumbai-400013

Maharashtra, India.

Phone : 022 6613 6000

Email : [care@welspun.com](mailto:care@welspun.com)

---