



Name Of Policy: GDPR Privacy Policy	Number:1
Domain: Privacy_IT	Category: Policy
Date Issued: 16.05.2019	Issued By Direction Of: Mr. R.K. Parwal (EVP- Finance and Systems)
Date Revised:20.01.2024	Revised By Direction Of: Mr. G. Manikandan (Chief Financial Officer)

GDPR Privacy Policy

Protecting your privacy

This Privacy Policy explains how GMMCO Limited (hereinafter referred to as “**Company**” or “**We**” or “**Us**”) collect, use, share, and protect information in connection with the Company services that refer or link to this Privacy Policy ("our Services"). This Privacy Policy applies regardless of the type of device you use to access our Services. This Privacy Policy defines what type of Personal Information the Company collects when you access the Company website or at the time of any other business transaction with our Company, how we use and share that information and what choices are available to you regarding the use of your personal information. We advise you to read this Privacy Policy carefully in order to understand the scope of our Privacy Policy. This Privacy Policy applies to GMMCO website and all its subdomains.

For the purpose of the General Data Protection Regulation (“**GDPR**”), our Company is the ‘Data Controller’. Our Chief Privacy Officer Mirza Qaiser Iqbal Beg can be contacted at Unit 701-712, 7th Floor, Brigade Senate-2, Hebbal, Kempapura, Bengaluru 560094 , India. This Privacy Policy further specifies the rights available to European Union (“**EU**”) and European Economic Area (“**EEA**”) in compliance with GDPR.

The Company reserves the right to change this Privacy Policy at any time by posting the updated Policy here along with the date on which the Policy was changed. If we make material changes to this Privacy Policy that affect the way we collect, use and/or share your personal information, we will notify you by including a "NEWLY UPDATED" label with the "PRIVACY POLICY" link for 30 days after material changes are made.

1. Information we collect and how we collect it

We collect and maintain personal information about you from many sources to understand and meet your needs, vendor appointments, manage our business, and for other purposes disclosed to you. For example, we collect personal information about you from:

- You, when you voluntarily provide us with information
- Through the vendor registration form of our Company before initiation of any business transactions with our Company
- Cookies

Our Company does not collect personal information about users of GMMCO website, unless you voluntarily choose to provide us with it for any purpose, except in the manner as set out in this Privacy Policy. If the information is to be collected directly from you, you may in some cases have the option to decline providing that information. However, your choice to not provide information may impact your use of certain features or services. We collect your personal data only after obtaining consent from you and you have the right to withdraw your consent by sending a request to the Privacy Officer from your email ID which is registered with our Company. The Chief Privacy Officer processes such request subject to authentication of your identity and other legal & statutory requirements.

The personal information we collect about you through these various sources is limited to,

- Name, addresses, email and telephone numbers
- Organization name along with designation with whom you are working
- Information provided via survey, focus group or other marketing research efforts

The collection of your personal information is mandatory to enable our Company to either fulfill the request initiated by you on our Company website or for facilitation of any business transaction with you, being a vendor of our Company. If you do not provide this information, we will not be able to provide you either address your request on our Company website and in case of vendors, will be a hindrance in the business transaction contemplated with our Company.

The data collected is only limited to such data which we deem necessary to the elements which are necessary for a shared relationship with GMMCO. They are in no way intrusive or monetized but are merely for business related purposes.

Anonymous information: We may also collect non-personal data, such as referral sites, automatically in order to identify and understand the users' browsing habits. We use such anonymous information to study user's demographics, browsing preferences and interests. Such anonymous information is outside the scope of this Privacy Policy.

Minors

The Company does not knowingly collect personal information directly from children—persons under the age of Eighteen (18), or another age if required by applicable law, other than when required to comply with the law or for safety and security reasons.

If you are a parent or guardian of a child who has provided personal information without your knowledge and consent, you may request us to remove such child's information by emailing at GDPRsupport@gmmcoindia.com

Automatically collected information (including cookies and geolocation)

When you use our Services, we may receive technical information such as your browser type, the type of operating system you use, your geolocation, the name of your internet service provider, mobile advertising identifiers, and pages visited on our Services. Our Company gets this information by using technologies, including cookies, web beacons, and mobile device geolocation to provide and improve our Services and advertising, including across browsers and devices (also known as cross-device linking). We also use this information to verify that visitors meet the criteria required to process their requests and for reporting activity on our Services. For example, we may want to know how long the average user spends on our Services or which pages or features get the most attention. This automatically collected information may be combined with information that is personally identifiable in order to personalize our Services and advertising to your interests, including across browsers and devices.

Additionally, our Company may combine the information we receive from you with information collected from other sources. This information may be used to provide offers and/or services specifically tailored to your interests in accordance with applicable laws.

Cookies on our services

When you use our Services, you may receive cookies from us and the third parties that collect information on our Services. We use cookies to determine that we give you a high-quality experience on our Services. We also use cookies to show you advertising that is relevant to you. If you continue to browse our website without changing your web browser's or device's settings that control cookies, you agree to receive cookies when you use our Services.

However, if you prefer, you can change your cookie settings. Some browsers have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. You may elect to reject cookies by adjusting your settings, but doing so will limit the range of features available to you on our Services and other major websites that use cookies.

Our Services also occasionally use "local shared objects" (also known as "Flash cookies"). Like browser cookies, Flash cookies may be used for coordinating content delivery, website functionality, maintaining preferences, advertising, or analytics. Unlike browser cookies,

"Flash cookies" are not stored in the browser. You may be able to manage these Flash cookies by visiting the Adobe website.

What are the different types of cookies that our Company uses?

There are four types of cookies used on our Services:

1. Essential cookies – These cookies enable you to use our Services. These cookies are essential to enable you to browse our Services and use certain features. Disabling them may prevent you from using certain parts of the Services. Without these cookies, services like shopping activity and paying activity cannot be provided. These cookies also help keep our Services safe and secure.
2. Preference cookies – These cookies store information such as your preferred country and language selection, account login data and website preferences. Without these cookies, our Services may not be able to remember certain choices you've previously made or personalize your browsing experience by providing you with relevant information. These cookies can also be used to recognize your device so that you do not have to provide the same information more than once.
3. Performance cookies – These cookies collect information about how you use our Services such as which pages you visit regularly. These cookies are used to provide you with a high-quality experience possible by doing things such as tracking page load, site response times, and error messages. They are also used to gather feedback on customer satisfaction through surveys.
4. Content / advertising cookies – These cookies gather information about your use of our Services so we may improve your experience and provide you with more relevant content and advertising. They remember that you've visited our Services and help us understand usage of our Services. Some of these cookies are from third parties that collect information about users of our Services in order to provide advertising (on our Services and elsewhere) based on users' online activities (so-called "interest-based advertising") on our Services and elsewhere online. The third parties involved in interest-based advertising collect internet browsing information (e.g., websites visited, time of visit) across different websites and over time, and they may use the information they collect on our Services to provide you ads (from us and other companies) across the internet.

Information collected by third parties on our Services

Some of the content, advertising, and functionality on our Services may be provided by third parties that are not affiliated with us. As noted above, these and other third parties may collect or receive technical information about your use of our Services, including through the use of cookies, web beacons, and other technologies, and this information may be collected over time and combined with information collected on different websites and online services.

For example, some of our Services include social network or other third-party plug-ins (such as Facebook's "Like" button) that enable you to login to certain of our Services, to comment on content available on our Services, and to share things you find on our Services with your social network. The providers of these plug-ins may be able to collect information about you even if you do not click on or otherwise interact with the plug-in or widget and regardless of whether you have an account or other relationship with these social networks and third

parties. If you use social network tools or visit social networking sites, you should read their privacy disclosures to learn what information they collect, use, and share.

Also, some third parties collect information about users of our Services in order to provide interest-based advertising (on our Services and elsewhere, including across browsers and devices, also known as cross-device linking). These third parties may use the information they collect on our Services to make predictions about your interests in order to provide you ads (from us and other companies) across the internet. Some of these third parties may participate in an industry organization that gives users the opportunity to opt out of receiving ads that are tailored based on online activities. For more information about interest-based advertising and how to opt out, please visit the Digital Advertising Alliance. Due to differences between using apps and websites on mobile devices, you may need to take additional steps to disable targeted ad technologies in mobile apps. Many mobile devices allow you to opt out targeted advertising for mobile apps using the settings within the mobile app or your mobile device. For more information, please check your mobile settings. You also may uninstall our apps using the standard uninstall process available on your mobile device or app marketplace.

To opt out of interest-based advertising across browsers and devices, please opt out through the Digital Advertising Alliance or Network Advertising Initiative website and also through the settings within the mobile app or your mobile device. Your opt-out choice may apply only to the browser or device you are using when you opt out, so you should opt out on each of your browsers and devices if you want to disable all cross-device linking for interest-based advertising. If you opt out, you will still receive ads, but they may not be as relevant to you and your interests.

2. How your information will be used

Our Services

We use personal information to complete transactions and fulfill your requests for our products and services.

The Company may use your personal information for several purposes including, without limitation:

- **Business purposes and communication:** In case of any transaction with any vendor employment, to communicate with you for business.
- **Financials transaction management:** To facilitate payment transactions with vendors
- **Legal and Regulatory Obligations:** To comply with legal, regulatory, or fiscal obligations, or in connection with litigation or an internal investigation or audit
- **Tailored web experience:** To personalize your advertising experience when visiting our sites, and to manage details about your account, when security updates are available, or when an action is required to keep the account active
- **Marketing and Analytics:** To perform data analysis and other processing for marketing purposes
- **Site maintenance:** To improve content, functionality, and usability of our sites and to offer opportunities to participate in surveys and provide feedback to us

Additionally, the information voluntarily provided by you on our Company website may be processed by our Company for the following illustrative purposes:

- To understand your needs and respond to your questions and requests for any product or service information.
- To update you on important changes regarding the site and policies.
- To improve our products and services.
- To contact you by email, phone, fax or mail, if provided by you.
- To customize and improve the website based on the information and feedback we receive from you.
- To prevent and identify fraud, non-compliance and misuse of our Website service.

Security

The Company uses reasonable technical, administrative, and physical measures to protect your personal information. When your personal information is shared, the Company takes a reasonable approach to prevent the unauthorized use of personal information.

Please note, however, that while the Company attempts to safeguard your personal information, no method of transmitting or storing electronic information is ever completely secure, and thus we make no warranty, express, implied, or otherwise, that your information will never be accessed, used or released in a manner that is inconsistent with this Privacy Policy.

IN NO EVENT SHALL OUR COMPANY BE LIABLE FOR ANY DAMAGES (WHETHER CONSEQUENTIAL, DIRECT, INCIDENTAL, INDIRECT, PUNITIVE, SPECIAL OR OTHERWISE) ARISING OUT OF, OR IN ANY WAY CONNECTED WITH, A THIRD PARTY'S UNAUTHORIZED ACCESS TO YOUR INFORMATION, REGARDLESS OF WHETHER SUCH DAMAGES ARE BASED ON CONTRACT, STRICT LIABILITY, TORT OR OTHER THEORIES OF LIABILITY, AND ALSO REGARDLESS OF WHETHER WE ARE GIVEN ACTUAL OR CONSTRUCTIVE NOTICE THAT DAMAGES WERE POSSIBLE, EXCEPT AS PROVIDED UNDER APPLICABLE LAWS.

Cross Border Transfer:

There shall be no cross-border transfer or data retention for cross border service.

3. **With whom your information will be shared**

General

The Company does not share personal information with third parties except as stated in this Privacy Policy.

Where we are required by applicable law, we will seek your consent prior to sharing your personal information with any third party. Also, as described below, you can opt out of

having your information shared with third parties by emailing us at GDPRsupport@gmmcoindia.com.

In the event we undergo a business transition involving another company, such as a merger, corporate reorganization, acquisition, the lease or sale of all or a portion of our assets, or in the event of bankruptcy, information that we have collected from or about you or your devices may be disclosed to such other entity as part of the due diligence or business integration process and will be transferred to such entity as one of the transferred assets.

Legal requirements

Further, to the extent required by law, we may disclose personal information to government authorities, or to third parties pursuant to a subpoena or other legal process, and we may also use or disclose your information as permitted by law to protect the rights or property of our Company, our customers, our services, or its users.

Obtaining and handling your consent

By using our Services and submitting personal information to this site, you are accepting and consenting to the practices and uses described in this Privacy Policy. This Privacy Policy is not a contract. The Company will seek to obtain your additional consent where required by applicable law.

Application of local laws and safeguard

Where required by local law, you have the right to access, update or request that we delete your personal information. To inform us of inaccuracies or changes to your personal information, please email us at GDPRsupport@gmmcoindia.com. Our Company will, in accordance with applicable law, update, grant access to, or delete such information. Please note, requests to correct, transfer or delete personal information are subject to applicable legal, ethical reporting, or document retention obligations imposed on us.

Complaint Mechanism

You can use the email id GDPRsupport@gmmcoindia.com to contact our Chief Privacy Officer Mirza Qaiser Iqbal Beg Head Legal towards filing of complaint. We shall hold an enquiry upon receipt and accordingly reach out within forty eight (48) hours of receipt on further action to be taken. All costs towards the complaint shall be borne solely by the complainant and GMMCO shall only conduct enquiry upon the same.

4. How long does our Company hold of your personal information

Our Company will retain your personal information for as long as it is necessary to fulfil the purpose for which it was collected, and for satisfying any legal, business, accounting or reporting requirements or as required by relevant laws. To determine the appropriate retention period for personal data, our Company considers the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can

achieve those purposes through other means, and the applicable legal requirements. For EU residents, our Company endeavours¹ to delete data within thirty (30) days of a request for erasure or contact you if it will take longer. For more information, please refer Section 6 “Retention” of this Policy.

5. Your Rights if you are a EU/ EEA resident

These rights include:

- (a) right of access
- (b) right of data portability
- (c) right of correction
- (d) right of erasure
- (e) right to restrict processing
- (f) right to object

Please note that our Company will require you to provide us with proof of identity, subject to the complete satisfaction¹, before responding to any requests to exercise your rights and the requests will be entertained only when received from your email ID which is registered/ saved in the records of our Company. Our Company shall respond to your request without undue delay and at least within one month (although this may be extended by a further two months in certain circumstances). To exercise any of your rights, please contact us at GDPRsupport@gmmcoindia.com

(a) Access

You have the right to know whether our Company processes your Personal Data, and if we do, to access your Personal Data hold and certain information about how our Company uses it and who does our Company share it with.

If you require more than one copy of your Personal Data our Company holds about you, our Company may charge an administration fee.

Our Company may not provide you with certain Personal Data of yours, if providing it would interfere with another’s rights or where another exemption applies.

(b) Portability

You have the right to receive a subset of the Personal Data our Company collects from you in a structured, commonly used and machine-readable format and a right to request that our Company transfers such Personal Data to another party.

The relevant subset of your Personal Data is data that you provide our Company with your consent or for the purposes of performing our Company’s contract with you.

If you wish our Company to transfer your Personal Data to another party, please ensure you detail that party and note that our Company can only do so where it is legally, contractually

and technically feasible. The Company is not responsible for the security of your Personal Data, its transmission or its processing once received by such third party requested by you. Our Company also may not provide you with certain Personal Data if providing it would interfere with another's rights or where other exemptions apply.

(c) Correction

You have the right to ask for correction of any Personal Data held about you that is inaccurate. Our Company reserves the right to charge a reasonable administrative fee for this service.

(d) Erasure

You may request that our Company erases your Personal Data in the following circumstances:

- (i) you believe that it is no longer necessary for our Company to hold your Personal Data;
- (ii) Our Company is processing your Personal Data on the basis of your consent and you wish to withdraw your consent with reasons for such withdrawal and there is no other ground under which our Company can otherwise process your Personal Data;
- (iii) Our Company is processing your Personal Data on the basis of our Company's legitimate interest and you object to such processing. Please provide us with detail as to your reasoning so that our Company can assess whether there is an overriding interest for our Company to retain such Personal Data;
- (iv) you believe your Personal Data held by the Company is being unlawfully processed by our Company along with supporting records to show such unlawful processing.

Please provide as much detail as possible on your reasons for the request to assist our Company in determining whether you have a valid basis for erasure. However, our Company may retain your Personal Data if there are valid grounds under law for us to do so, but we will let you know if that is the case.

(e) Restriction of Processing to Storage Only

You have a right to require our Company to stop processing your Personal Data other than for storage purposes in certain circumstances. Please note, however, that if we stop processing your Personal Data, we may use it again if there are valid grounds under data protection law for us to do so including any legal or statutory requirements, claims or proceedings.

You may request that our Company restrict processing and just store your Personal Data where:

- (i) you believe Personal Data is not accurate, for the period it takes for us to verify whether Personal Data is accurate;
- (ii) you have objected to our Company processing your Personal Data on the basis of our legitimate interest and you wish our Company to restrict processing your

Personal Data whilst our Company determines whether there is an overriding interest in our Company retaining such Personal Data.

(f) Objection

At any time you have the right to object to the processing of your Personal Data with our Company on the basis of our legitimate interest and you object to such processing.

Please provide with detail as to your reasoning so that our Company can assess whether there is a compelling overriding interest in our Company continuing to process such data or we need to process it in relation to legal claims. Also note that you may exercise your right to request that we restrict processing of your Personal Data whilst our Company makes the assessment on an overriding interest.

In the event that you wish to make a complaint about how our Company processes your Personal Data, please contact our Company's Chief Privacy Officer and our Company will endeavour to deal with your request as soon as possible.

6. Retention

Our Company will retain your Personal Data for as long as it is necessary to fulfil the purpose for which it was collected, and for satisfying any legal, business, accounting or reporting requirements or as required by relevant laws. To determine the appropriate retention period for your personal data, our Company may consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which our Company processes your personal data and whether our Company can achieve those purposes through other means, and the applicable legal requirements.

7. Accuracy

Our Company needs your assistance to ensure that your Personal Data is current, complete and accurate. As such, please inform our Company of changes to your Personal Data by contacting our Company Chief Privacy Officer and submitting your updated particulars to in writing.

8. Security safe-guards

Our Company takes the protection of your Personal Data seriously. However, the transmission of information via the internet is not completely secure. Although our Company will do its best to protect your Personal Data, our Company cannot fully guarantee the security of your Personal Data transmitted through any channel, such as the Website; any transmission is at your own risk.

Links to other sites

We'd also like to remind visitors that we provide additional links to resources we think you'll find useful. These links will lead you to sites that are not affiliated with our Company and may operate under different privacy practices. Our visitors are responsible

for reviewing the privacy policies for such other websites, as we have no control over information that is submitted to these companies.

Opt out of marketing communications and sharing your information with third parties for marketing purposes

Our Company's websites do not honor web browsers' Do-Not-Track signals. You do have choices, however, when it comes to your privacy and internet browsing.

Due to differences between using apps and websites on mobile devices, you may need to take additional steps to disable targeted ad technologies in mobile apps. Many mobile devices allow you to opt out of targeted advertising for mobile apps using the settings within the mobile app or your mobile device. For more information, please check your mobile settings. You also may uninstall our apps using the standard uninstall process available on your mobile device or app marketplace.

To opt out of interest-based advertising across browsers and devices, please opt out through the settings within the mobile app or your mobile device. Your opt-out choice may apply only to the browser or device you are using when you opt out, so you should opt out on each of your browsers and devices if you want to disable all cross-device linking for interest-based advertising. If you opt out, you will still receive ads but they may not be as relevant to you and your interests.

Other companies or programs affiliates may require different steps to change your preferences for participation. Please consult the privacy policies of the relevant companies or programs for further information.

9. Condition to use our Company website

User is not authorized to misuse the information displayed on our website. For example, there shall be no interference with or try to access the website using a method other than the interface and the instructions that our Company shall provide. The user shall not use content from our services unless you obtain permission from its owner or are otherwise permitted by law. Our Company reserves the right to end or suspend website services, any or all, without notice or liability. The same may apply when the user infringes the Terms & Conditions mentioned in this Privacy Policy, there are some security issues or if our Company is investigating suspected misconduct.

These terms do not grant you the right to use any branding or logos used on our Website. Don't remove, obscure, or alter any information displayed in or along with our Website. Using our Services does not give the User the ownership of any intellectual property rights in our website or web site content.

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