

HINDUSTAN PETROLEUM CORPORATION LIMITED

PRIVACY POLICY

1. Scope

- 1.1. In this Privacy Policy, **Us, Our, We,** or **HPCL** means Hindustan Petroleum Corporation Limited, a company incorporated under Indian laws, having its registered office at [17, Jamshed ji Tata Road, Petroleum House Church Gate Mumbai 400020. All individuals whose personal information is either collected, received, processed, stored, transferred or shared by us is hereinafter referred to as **“Data Subject”** or **“you”**.
- 1.2. We produce and distribute a wide range of petroleum products. In doing so, we may collect, receive, process, store, transfer or share certain personal information about you. When we do so, we are regulated by the applicable laws in India including the Information Technology Act 2000, the Information Technology (Reasonable Security Practices and Procedures for Sensitive Personal Data and Information) Rules 2011, and the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act 2016 and related rules (collectively termed as **“Applicable Laws”**).
- 1.3. We ask that you read this Privacy Policy (**“Privacy Policy”**) carefully as it contains important information about who we are, how and why we collect, receive, process, store, transfer and share personal information, your rights in relation to your personal information, and how to contact us. This Privacy Policy should be read alongside, and in addition to any separate product or service agreement entered into between us or any other related terms of use, from time to time.
- 1.4. By accessing our products or services using any medium – website, mobile application or otherwise - you consent to us using your personal information in the way described in the Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not use or access our products and services.
- 1.5. By accessing / using or availing any of our products and services or by providing any information to us, you represent that you voluntarily provide us with information including Personal Information, and consent to their collection, use and disclosure in accordance with this Privacy Policy. You also represent that you are duly authorised by any third party whose information you may share with us.
- 1.6. This Privacy Policy is divided into the following sections:
 - 1.6.1. Important definitions
 - 1.6.2. How to contact us – Grievance Officer
 - 1.6.3. What Personal information we collect
 - 1.6.4. How we collect Personal Information
 - 1.6.5. Who does this Policy apply to
 - 1.6.6. Why we collect Personal Information
 - 1.6.7. Who we share Personal Information with
 - 1.6.8. How long we keep Personal Information
 - 1.6.9. Transfer of Personal Information outside India
 - 1.6.10. Your rights
 - 1.6.11. Security practices
 - 1.6.12. Updates to the Privacy Policy

2. Important Definitions

- 2.1. Agent: Any individual or entity which has a contractual relationship with HPCL, and which collects any Personal Information, on behalf of, at the behest of or transmits such information to, HPCL, is hereinafter referred to as an "**Agent**" for the purpose of this policy. For instance, HPCL's distributors, dealers, CFA, Contractors, etc. will be considered Agents for the purpose of this policy.
- 2.2. Personal Information: Personal information means any information of a natural person which can assist in identification of that person. Personal information of a Data Subject collected by HPCL under this Privacy Policy is hereinafter referred to as "**Personal Information**". Such Personal Information includes, inter alia, sensitive personal data as defined under Information Technology (Reasonable Security Practices and Procedures for Sensitive Personal Data and Information) Rules 2011 as also, if provided by you, the Aadhaar number and/or the biometric information associated with an Aadhaar number.
- 2.3. Third-Party: Any individual or entity over which HPCL does not have any control or ownership, and which operates independently on its own is hereinafter referred to as a "**Third Party**".

3. How to contact us – Grievance Officer

- 3.1. If you have any questions, concerns or suggestions about how we handle your Personal Information, you can reach out to our Grievance Officer.
Name: Mr Ajith S – Senior Manager
Email ID: ajiths@hpcl.in
Phone number: 04067294585
Address: Hindustan Petroleum Corporation
Information Systems Center, 40, Hi Tech City, Phase II
Madhapur, Hyderabad - 500081
- 3.2. This Grievance Officer will serve as the designated Grievance Officer under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011.

4. What Personal Information we collect

Below is a list of types of information that we may collect or receive when you use our products or services or access our website or mobile application.

Type of personal information	Description
Contact details	Your name, phone number, email ID, address and other ways in which to contact you.
Profile details	Details such as date of birth, gender, official identity documents etc. that you enter/provide to avail any products or services.
Transactional details	Details about the transactions you carry out with us.
Contractual details	Details about the contracts that you enter into with us.
Location details	Data we get about where you are. This may come from your mobile phone or other electronic devices.
Technical details	Details about the devices and technology you use such as hardware models, device IP address, operating systems and versions, software, preferred languages, unique device identifiers,

	advertising identifiers, serial numbers, device motion data, and mobile network data.
Communications	Details of communications made with us including what we learn about you from the communications, and any feedback that we may receive from you.
Public and third-party data	Details about you that are publicly available on the internet. We may also receive information about you from third-parties like business partners, technical sub-contractors, analytics providers, search information providers etc.
Usage data	Data about how you use our websites or mobile applications including through the use of cookies or other tracking software. This includes data such as access dates and times, website or app features or pages viewed, website or app crashes and other system activity, type of browser, and third-party sites or services used before or in the course of interacting with our services.
Consent data	Any permissions, consents or preferences that you give us on our websites, mobile applications or otherwise.

The type of information that is collected by us will be based on the products or services of HPCL that you use, utilise or access.

5. Who does this Policy apply to

This Policy applies to all individuals whose Personal Information in course of use of or access to our products or services is either collected, received, processed, stored, dealt with or handled by us.

6. How we collect Personal Information

6.1. We collect or receive Personal Information about you through the following means:

- (a) whenever you show an interest or elect to use our products or services, including information about our schemes, irrespective of whether such products or services are provided directly by us or by our Agents acting on our behalf;
- (b) through our network of Agents or a Third Party which collects such Personal Information and transfers it to us for an actual or possible business requirement;
- (c) when you download our mobile applications or visit any of the websites owned by us and/or create an account on the mobile applications or the websites;
- (d) when you directly choose to share your Personal Information with us.

7. Why we collect Personal Information

7.1. We use your Personal Information to conduct our business and to provide you with the best possible products and services. We will only use your Personal Information based on this Privacy Policy, our understanding with you, or as required by Applicable Laws.

7.2. We will collect adequate, relevant and necessary Personal Information and will process such Personal Information fairly and lawfully for the purpose it is collected. Most commonly, we will use your Personal Information for the following purposes:

- (a) Where we need to perform the obligations we have promised you such as to provide a product or service to you and to enable your use of our products or services, including but not limited to dealing with enquiries and complaints made by or about

- you relating to the products or services provided by us and to improve and customise our products and services in accordance with your preferences;
- (b) Where we need to comply with a legal, accounting, business or reporting obligation, or the provisions of any law, including compliance with requests from the Government of India or any Governmental Agency;
 - (c) To send marketing as well as non-marketing commercial communications to you;
 - (d) To send you notifications that you have specifically requested for as well as to send statements, invoices and payment reminders to you, and to collect payments from you;
 - (e) To provide Third Parties with anonymised statistical information about our customers;
 - (f) To keep our websites, mobile applications and other systems secure and to prevent fraud;
 - (g) To promote the mission and objectives of Skill Development in India and/or to provide and disseminate information about relevant programmes under the Skill Development Mission.
 - (h) To manage your employment or applications for employment/engagement with us.

7.3. By providing your Personal Information, you agree that we may collect, use and share this Information with Third Parties for the purposes mentioned above from Paragraph 7.2 (a) to (h).

7.4. We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider it necessary to use the Personal Information for another reason and that reason is compatible with the original purpose.

7.5. We may not be able to perform the obligations we promised you, or we may be prevented from complying with our legal, accounting, business or reporting obligations if you fail to provide certain Personal Information when requested by us. In such a situation, we will not be held liable in any manner whatsoever if there is any delay or deficiency in our products or services. We and our Agents, employees, directors, associates, etc. will not be liable to you against any complaints, legal proceedings or claims filed or initiated by you or any Third Party against us in this regard.

8. Who we share Personal Information with

8.1. We may disclose your Personal Information to any of our Agents or Third Parties insofar as reasonably necessary for the purposes set out in this Privacy Policy and for the purpose of providing our products and services to you or to possibly commence a contractual relationship. Such Agents and Third Parties are expected to provide a similar level of protection to your Personal Information as provided by us.

8.2. In addition to this, we may disclose your Personal Information:

- 8.2.1.** where it is mandated under law or sought by Governmental Agencies.
- 8.2.2.** to our group companies including affiliates, associates, joint ventures or are otherwise controlled by / under the common control of HPCL to enable us to assimilate the information and create singular profiles, which may enable us to offer personalized products or services, cross-sell products or services offered by other members of the group companies of HPCL, and undertake relevant marketing initiatives, etc., which are broadly in line with the purpose mentioned herein.
- 8.2.3.** to our legal advisors, consultants, etc. if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.

9. How long we keep Personal Information

- 9.1. We will keep your personal information as long as it is necessary to fulfil the purpose for which it was collected or for any other legal, accounting, reporting or business purposes.
- 9.2. To ensure compliance with Applicable Laws, we may need to retain information even after you have terminated your account (if any) with us or stopped using our products or services. We may also keep your contact information and other details for fraud prevention and for the exercise/defence of a legal claim or for providing evidence in legal proceedings. It is clarified that in case you terminate your account (if any), we have no obligation to retain your Personal Information, and we may delete any or all of your data without any liability to us and at our sole discretion.
- 9.3. Post termination, we may continue to use your anonymised data which is aggregated or combined with anonymised data of other users. We use this for analytics, research and other business purposes.

10. Transfer of Personal Information Outside India

Unless stated otherwise, we store and process your Personal Information in India. There may, however, be occasions when we need to transfer your Personal Information outside India for our business requirements. In such instances, we will exercise the same level of care in handling the Personal Information outside India as we do in India, and shall take such actions only in compliance with the laws of India.

11. Your rights

- 11.1 You will have the following rights with regard to your Personal Information and you can exercise these rights by writing to our Grievance Officer at [_____].
 - (a) Confirmation: You can ask us to confirm if we are processing your Personal Information.
 - (b) Review: You can ask us for a copy of your Personal Information held by us.
 - (c) Rectification: You can inform us about changes to your Personal Information, and ask that we correct any erroneous or incorrect data held by us. We are not responsible for the authenticity of the data you provide to us. Please ensure you notify us without undue delay of any changes to the Personal Information that you have provided to us by updating your details on our websites or mobile applications or by contacting our Grievance Officer at the details provided in this Privacy Policy.
 - (d) Restrictions on Processing: You can ask us to erase your Personal Information, block or restrict the processing of your Personal Information, or object about specific ways in which we use your Personal Information. We will try to comply with your reasonable request and will be obligated to do so only to the extent as may be required under the Applicable Laws.
 - (e) Right to Opt Out: We or our service providers or Agents may communicate with you through voice calls, text messages, emails, app notifications, or other means. The communication may relate to (a) our products and services, (b) promotional offers, or (c) any other information that we may want to share with you. You may opt out of receiving information about promotional offers by writing to us. But even if you opt out of receiving information from us, we may still send you non-promotional communication.

11.2 You have the option to withdraw consent given to us for collection and processing of your Personal Information. In such cases, we reserve the right to stop providing products or services for which your Personal Information was sought. Your withdrawal will become effective when you receive an acknowledgment from us. You understand that despite your request to withdraw consent, we may still need to retain some data about you for complying with Applicable Laws and to protect our interests and further that we are obligated to stop processing of your Personal Information only to the extent required under the Applicable Law.

12 Security Practices

We deploy adequate technical and organisational security measures as prevailing in the market to protect your Personal Information. Some of these include: firewalls, encryption, and access controls.

13 Liability

While we will take reasonable precautions and security measures to protect all Personal Information, including yours, in line with the market practices, however we shall not be held responsible for any loss or damage caused on account of any unauthorized access, disclosure or leakage of any Personal Information, unless the same is directly attributable only to HPCL's gross negligence. We are also not responsible for the confidentiality, security or distribution of your Personal Information by any third parties outside the scope of our agreement with you or with such third parties or which occurs for reasons beyond our reasonable control, including acts of Government, unauthorised access to computer data or any storage device, computer or system crashes, hacking, breach of security or encryption, problems associated with any internet service or any acts or negligence on your part. You further agree that we are not responsible in any manner for any action of yours or of any third party, which leads to any harm or loss or damage to you or any third party.

14 Updates to the Privacy Policy

We may update this Privacy Policy from time to time at our discretion. We urge you to keep visiting this page so you remain updated about the changes, if any. Your continued use of our products and services will be construed as your confirmation, consent and acceptance of the modifications to the Privacy Policy.