

SFL'S PRIVACY POLICY ON PERSONAL DATA PROTECTION

INTRODUCTION

Sundram Fasteners Limited (hereinafter referred to as “the Company,” “we,” “us,” “our,” or “SFL”) is committed to respecting, protecting, and upholding the privacy of all individuals whose Personal Data we collect and process.

This Privacy Policy applies to all employees, business partners, vendors, contractors, distributors, customers, and any other stakeholders (collectively referred to as “you,” “your,” or “Information Providers”) who share Personal Data with us.

We are committed to implementing robust privacy and security practices and ensuring full compliance with the **Digital Personal Data Protection Act, 2023** and the **Digital Personal Data Protection Rules, 2025** (“DPDP Act & Rules”).

1. OBJECTIVE AND SCOPE

The objective of this Privacy Policy is to provide a clear explanation of:

- What Personal Data we collect
- How we collect, use, store, and protect it
- Whom we share it with
- Your rights under the DPDP Act & Rules

This Policy applies to all Personal Data collected through various interactions, including:

- Recruitment process, onboarding, and employment lifecycle activities
- Use of our websites, mobile applications, social media platforms, webinars, and digital events
- Interactions with current, former, or prospective suppliers, distributors, and business partners
- Engagement through customer service channels, email, chat, SMS, or in-person visits
- Participation in Company events, promotions, surveys, or feedback mechanisms

2. CATEGORIES OF PERSONAL DATA WE COLLECT

The Company may collect, store, and process the following categories of Personal Data depending on the nature of your relationship with us:

- **Demographic, Identity & Contact Data:** Such as Name, date of birth, gender, marital status, language, addresses (with PIN code), contact number, nationality, religion, caste, spouse name, etc.
- **Authentication Data:** Signature proof.
- **Personal Identification Documents:** Aadhaar card, PAN card, passport, voter ID, GSTIN, driving licence, ration card.
- **Financial Account Details:** Bank account number, IFSC, bank statements, loan details, credit bureau data, income information, salary slips, Form 16, ITR, etc.
- **Educational & Professional Data:** Résumé, qualifications, certifications, employer information, and work experience.
- **Employee/Worker Health Data:** Medical reports, blood group, height, weight.
- **Online Identifiers & Technical Data:** IP address, device ID, browser type, access timestamps.
- **Device Information:** Operating system, hardware model, network information, storage details, and device interactions with our services.
- **Mobile App Permission-Based Data:** Camera access, contacts, location, photos, storage, SMS.
- **Asset-Related Data:** VIN, chassis number, engine number, model details, registration number, movable/immovable property information.
- **Communication Details:** Mobile numbers, email addresses, contact lists.
- **Generated Data:** System logs, transaction history.
- **Testimonials:** Name, city, and any Personal Data voluntarily shared through testimonials.

3. PURPOSE OF COLLECTION, USE, AND SHARING

We process your Personal Data only for lawful, legitimate, and business-related purposes, including:

- Managing the employment lifecycle including recruitment, onboarding, payroll, performance management, and workforce operations
- Complying with legal, regulatory, statutory, and judicial requirements
- Ensuring adherence to Company policies, Code of Conduct, and internal procedures
- Facilitating core business operations and service delivery through authorized service providers
- Fulfilling contractual obligations between you and the Company
- Detecting and preventing fraud, security risks, or unlawful activities
- Defending or exercising legal rights in judicial or regulatory proceedings

4. HOW WE COLLECT PERSONAL DATA

We collect Personal Data through the following channels:

- Information provided on our websites, mobile applications, service portals, and support platforms
- Phone calls, emails, SMS, and authorized instant messaging platforms
- Product purchases, subscriptions, surveys, or feedback submissions
- Recruitment portals, referrals, and professional networks during hiring
- Physical interactions at our offices, events, or roadshows
- Data received from approved suppliers, distributors, and referral partners
- Information available through voluntary engagements on social media platforms
- Automated retrieval through secure APIs from government and financial databases (e.g., UIDAI, GSTN)
- Automatically collected device and browser data during digital interactions

If you provide Personal Data about others, you represent that you are authorized to share such information.

5. SHARING OF PERSONAL DATA

Your Personal Data may be shared with:

- **Authorized service providers** (e.g., IT hosting, payroll, background verification, logistics)
- **Auditors, legal advisors, and tax consultants** for compliance and governance
- **Government bodies and law enforcement agencies** where required by law
- **Courts and regulatory authorities** to comply with legal processes
- **Entities involved in mergers, acquisitions, or business transfers**, if applicable

6. PERSONAL DATA SECURITY AND RETENTION

We employ appropriate physical, technical, and administrative safeguards to prevent unauthorized access, alteration, disclosure, or deletion of your Personal Data.

We retain Personal Data only for as long as necessary to:

- Fulfil the purposes described in this Policy
- Comply with applicable laws, regulatory requirements, and ongoing litigation

All employees and third-party service providers are bound by confidentiality and data protection obligations.

7. BASIS FOR PROCESSING PERSONAL DATA

We process Personal Data under one or more of the following grounds:

- **Consent** for specific purposes
- **Legal obligation**
- **Employment-related necessity**
- **Reasonable purposes** (e.g., fraud prevention, business improvement)
- **Contractual necessity** to execute agreements

8. YOUR RIGHTS

Under the DPDP Act 2023 & Rules 2025, you have the right to:

- **Access Information:** receive a summary of your Personal Data and details of third parties it is shared with
- **Correction:** rectify inaccurate or incomplete data
- **Erasure:** request deletion subject to legal conditions
- **Grievance Redressal:** contact our Grievance Officer, and escalate to the Data Protection Board if unsatisfied
- **Nomination:** appoint a nominee to exercise your rights upon incapacity or death
- **Withdraw Consent:** revoke consent at any time, subject to service limitations

9. LEGAL DISCLAIMER & LIMITATION OF LIABILITY

The information and services provided on our digital platforms are offered **“AS IS” and “AS AVAILABLE.”** The Company disclaims all implied warranties to the fullest extent permitted by law. We are not liable for any indirect, incidental, or consequential damages arising from:

- Errors in digital content
- Unauthorized access to servers
- Bugs, viruses, or harmful components transmitted through our platforms

10. DISPUTE RESOLUTION

Any dispute relating to Personal Data processing shall follow this mechanism:

1. **Amicable Resolution** — Parties shall attempt mutual resolution within 30 days of notice.
2. **Mediation** — If unresolved, disputes shall be referred to mediation under the DPDP Act and the Mediation Act, 2023:
 - The Board may direct mediation where appropriate
 - Parties may mutually appoint a mediator
 - In absence of consensus, mediation will be conducted as per applicable laws

11. GRIEVANCE REDRESSAL

For questions, concerns, or to exercise your rights, please contact our **Grievance Officer**:

Name: R Ganesh, **Designation:** VP Finance & Projects

Address: No.98-A, VII Floor, Dr.Radhakrishnan Salai, Mylapore, Chennai - 600004

Email: ganesh.r@sfl.co.in

Phone: 044 28478500

We will acknowledge your grievance within **24 hours** and aim to resolve it within **7 working days**, or as required by applicable law.

12. EXTERNAL RECOURSE

If you are unsatisfied with the resolution provided by our Grievance Officer, you may escalate the matter to the **Data Protection Board of India** under the DPDP Act.

13. POLICY UPDATES

We periodically review and update this Privacy Policy to maintain legal compliance and transparency. Any revised version will be posted with an updated "**Last Updated**" date. Continued use of our services constitutes acceptance of the updated Policy.

Last Updated: 10th March 2026