



Privacy Policy

Pursuant to applicable provisions of the Information Technology Act, 2000, the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and the Information Technology (Intermediaries Guidelines) Rules, 2011, as amended from time to time (cumulatively hereinafter referred to as "IT Rules"), this Policy outlines the manner in which Personal Information or Sensitive Personal Information will be handled or dealt with by HSE Solutions Private Limited.

1. Name of the Organisation:

HSE Solutions Private Limited (hereinafter referred to as the "Company")

2. Grievance Officer (Manager in charge of data protection):

Gregoire Berrichon- gberrichon@prevor.com

3. Address of the Organisation:

HSE Solutions Private Limited.
116, 1st Floor,
TV Industrial Estate, Worli Colony,
Mumbai 400030,
Maharashtra, India.

4. Purpose of data collection, processing, or use:

The Company is involved in the marketing of safety solutions manufactured by PREVOR, a France headquartered safety solutions provider. The Company realises the importance of "Personal Information" including "Sensitive Personal Information" (defined below), provided to it by natural persons (information providers - defined below), under lawful contract and the trust they place with respect to maintaining the security of this information. With respect to Personal Information ("PI") including Sensitive Personal Information, the Company shall take reasonable steps to keep such information confidential and may share it with affiliates and third parties on a need to know basis under appropriate arrangements. Such information would generally include any information which is capable of identifying you.

Notwithstanding anything contained in this Policy or any other document, you agree and confirm that the Company may disclose and transfer the PI including Sensitive Personal Information collected about you to any of its affiliates, agents or third party service providers in connection with the products and/or services you have sought from, or your employment with the Company or to provide better products and/or services to you or to ensure compliance with a legal or contractual obligation of the Company.

"Personal Information" also referred to as "PI", for the purposes of this Policy, refers to any information that relates to a natural person which either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.



"Sensitive Personal data or information of a person" hereinafter referred to as "Sensitive Personal Information" or "SPI", for the purposes of this Policy refers to such personal information about a natural person, which consists of information relating to:

- i. Password;
- ii. Financial information such as Bank account or credit card or debit card or other payment instrument details;
- iii. Physical, physiological and mental health condition;
- iv. Sexual orientation;
- v. Medical records and history;
- vi. Biometric information;
- vii. Any detail relating to the above clauses as provided to us for providing products and/or services; and viii. Any of the information received under any of the above clauses by us for processing, storing or processing 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 Information for the purposes of this Policy.

"Information Provider" for the purpose of this Policy, refers to a natural person or individual who provides PI or SPI directly under lawful contract to the Company. In this Policy, the providers of information are referred to as "you".

The Company will:-

- ordinarily collect Pi and/or Sensitive Personal Information that it believes is necessary for a lawful purpose connected with a function or activity necessary to deliver, promote or market services/products or to carry out primary business functions and/or activities, comply with applicable regulations or in the capacity as an employer or a counterparty to agreements with individuals/ customers.
- Generally collect only such information about you when you provide it or you have consented to provide the information or where it is required by law.
- only collect such information by lawful and fair means and not in an unreasonably intrusive way.
- collect such information from you when you apply for a service/product. Any such information collected will be kept confidential.

Apart from the necessity to collect your information in order to provide a service (or products) to you or maintain a business or employment relationship with you, the purposes for which the Company would generally collect and use your Sensitive Personal Information will include but are not limited to:

- complying with legislative and regulatory requirements;

performing administrative functions; and



- offering you products and services that may interest you.

The PI and/or SPI collected from you may be collected and/or retained either directly by the Company or through or with an affiliate or third party. The Company will be able to share the names and addresses of entities that may collect and/or retain SPI, upon receiving a valid and written request in this regard. The Company, its affiliates and third parties it shares PI and SPI with, will not retain the information collected for longer than is required for the purposes for which such information may be lawfully used or is otherwise required under any law for the time being in force. The SPI collected shall be used for the purpose for which it has been collected. You have the option not to provide the Company with the SPI sought to be collected. You also have the option to withdraw the consent given earlier provided it is sent to us in writing.

Wherever necessary, the Company will seek your consent in writing, in the form of a letter, email, fax or in any other electronic form. You shall be given the option to not provide or refuse to provide the SPI sought by us. However, if you opt out, the Company will not be able to provide the related product and/or service to you.

While providing PI or SPI of another natural person to the Company, appropriate authorization of that natural person will be obtained.

5. Description of the groups of persons concerned and the data or categories relating to such persons:

PI, SPI, Customer data, employee data, and data of suppliers insofar as such are necessary for the fulfillment of the purposes mentioned under Item 4 above.

6. Recipients or categories of recipients to whom the data may be disclosed:

Ordinarily, the Company will not use or disclose SPI collected about you to a third party otherwise than for the purposes set out in this Policy, unless the disclosure is necessary for compliance of a legal obligation or where it is agreed to in the contract with you or as consented by you. The Company will also not publish the SPI unless the same is required for compliance of a legal obligation or as consented by you.

Provided that such information shall be shared without your consent, with government agencies mandated under law to obtain information including SPI for the purpose of verification of identity or for prevention, detection, investigation including cyber incidents, prosecution and punishment of offences.

Notwithstanding anything contained in this Policy, any PI and/or SPI shall be disclosed to any third party if required by an order under a law for the time being in force.

You authorize the Company to disclose necessary PI and SPI to affiliates, agents or third party service providers who provide services to the Company in connection with the services/products you have sought from, or, your employment with, the Company.



These parties are prohibited from using your SPI except for the specific purpose for which the Company supplies it to them and from disclosing it further.

Subject to what is permitted by law, the types of third parties (whether in India or overseas) your PI and SPI could be disclosed to may include:

- agents, contractors, service providers and external advisers engaged by the Company from time to time to carry out, provide services or advise on the functions and activities;
- other related bodies corporate /affiliates of the Company
- regulatory bodies, government agencies, law enforcement bodies and courts; and
- any person who the Company deems necessary for carrying out the instructions you give to the Company.

7. Time limits for the deletion of data and Access:

The legislature has enacted a number of obligations as to storage of SPI. SPI will be deleted if the purposes mentioned under Item 4 above cease to apply. You may review the SPI you have provided to us for the purpose of ensuring the said information is accurate. The Company shall not be responsible for the authenticity of the information you have supplied to it or to any person acting on its behalf.

The Company may not be able to provide access to information which is not directly provided by you. The Company may charge you a fee for accessing your SPI.

8. Data transmission to other nations:

The Company may transfer your PI and/or SPI to any person or entity whether in India or located in any other country that ensures a similar level of data protection as provided in the IT Rules when the same is necessary for the performance of a lawful contract with you or where you have consented to such transfer. The SPI transferred would include such information provided to the Company either directly by you (the information provider) or by any legal entity with whom you (the information provider) are associated with in any capacity.

9. Google Analytics:

This website uses Google Analytics, a web analysis service provided by Google inc. ("Google"). Google Analytics uses so-called "cookies", text files that are saved on your computer and enable analysis of your use of the website.

The information about your use of this website generated by the cookie (including your IP address) is transferred to a Google server in the United States and is saved there. Google will use this information in order to analyze your use of the website,



compile reports on website activity for the website operators and provide further services related to website usage and internet usage.

Google will also, where applicable, transfer this information to third parties where this is a legal requirement, or insofar as third parties process this data on Google's behalf. Google will not link your IP address to other data saved by Google under any circumstances. You can prevent the installation of cookies by appropriately setting your browser software; however, we would like to point out that this may result in not being able to use all functions of this website to the full extent.

You can at any time and with effect for the future object the collection and use of your IP address with Google Analytics.

Please note that the Google Analytics code "gat._anonymizeIp();" is used on this website. This means that IP addresses are anonymized by removing the last octet of the visitor's IP address prior to its use and storage.

Please do not hesitate to contact our data protection representative directly Gregoire Berrichon- gberrichon@prevor.com) with any questions you may have regarding the processing of your personal data.

10. Security:

The Company has adequate security practices and procedures to ensure that the information assets are adequately protected. The Company strives hard for ensuring that the SPI it holds is protected from misuse, loss and unauthorized access, modification, or disclosure.

11. Amendments:

This Policy may change from time to time. You may access a current version of the Privacy Policy from the HSE Solutions website (www.hsesolutions.in)