

Privacy Notice | APAR

www.apar.com

Introduction

APAR respects the privacy of its customers, suppliers, distributors, subscribers, prospects, business partners, event attendees, employees, job applicants, website and mobile application users or any persons (collectively “you” / “your” / “its”) and APAR (collectively “we” / “our” / “us”) is committed to protecting its personal data, its privacy and security including its Sensitive Personal Data & Information (SPDI).

To that end, we have put together this Privacy Notice (“Privacy Notice”) to give you a better understanding of our practices with respect to the collection, use, disclosure, and retention of personal data obtained in connection with the use of our Website and our marketing efforts.

For purposes of this Privacy Notice:

The term “personal data” means any data about an individual who is identifiable by or in relation to such data (as defined in Section 2(t) of The Digital Personal Data Protection Act, 2023

Please take time to read this Privacy Notice and the related statements in their entirety to ensure you are fully informed. If you have any questions or concerns about our processing of your personal data, please contact us by using the contact details under the “Contact Information” heading below.

Customer and Partner Privacy Notice. Our privacy practices covers collection, use, and disclosure of personal data obtained in connection with the use of our products and related services, including professional services and trainings that we provide to Customers Distributors, Suppliers and Partners. It also describes our privacy practices with respect to customer and partner contact information we process for Customer/ Distributors/ Suppliers Partner account, contract/agreements/other arrangements, and billing management purposes (e.g., the processing of address and billing information) in connection with the use of our products and services, or technology provided by our partners, Distributors, Suppliers and Customers.

Talent Acquisition Privacy Notice. Our career portal covers our privacy practices in connection with an individual’s application for employment or interest in potential employment opportunities at APAR.

Employee/ Worker Privacy Notice. Our intranet portal covers our privacy practices in connection with administration of services to an employee/ worker at APAR.

Who Is Collecting It?

Any personal data provided by you to us or collected by APAR is controlled by APAR Industries Limited, the Data Controller.

This Privacy Notice applies to personal data provided by you to APAR in connection with the services and products offered by APAR. References to “APAR” in this Notice means APAR Industries Limited and any company directly or indirectly owned and/or controlled by APAR Industries Limited and its group companies that you are interacting with or have a business relationship with.

This Privacy Notice also applies to APAR’s marketing content, including offers and advertisements for APAR products and services, which we (or a service provider acting on our behalf) send to you on third-party websites, platforms and applications based on your site usage information. These third-party websites generally have their own Privacy Notice and Terms and Conditions. We encourage you to read them.

How We Obtain Your Personal Data

As further described below, we collect several types of personal data from and about you that broadly falls into the following three (3) categories:

1. Personal data voluntarily provided by you to us inter alia:

- When filling out forms or browse on our Website.
- When you register for a demo of one of our products or services. When you enter a contest or promotion we sponsor.
- When you contact us.
- When you complete one of our surveys.
- When you register for or attend an event.
- When you visit our corporate offices/ plants/ units/ branches/ registered office and other offices.
- When you report an incident or concern or ask a question.

In each case, the personal data collected may include (but is not limited to):

- First name
- Last name
- Business or preferred mailing address
- Business or preferred email address
- Business or preferred telephone Number

- Company or organization name
- Job title or role
- IP Addresses
- Browsing details
- Device and connectivity details,
- Qualifications
- Background references
- Experiences
- Biometrics
- Health data and
- Pictures, photo and video

If we ask you to provide any other personal data not described above, then the personal data we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect it. If we ask you to provide personal data that we consider to be mandatory for us to administer your relationship with us, we will inform you of such at the time of collection. In addition, we will also inform you of the consequences for not providing us with the mandatory personal data.

2. Personal data from third parties.

From time to time, we may collect and use personal data we receive about you from third parties in connection with your use of our Website or attendance at an event. For instance, we may receive personal data about you from our business partners related to your registration information for events. We also use third parties for reporting and analytics to measure the effectiveness of our Website and marketing efforts, and to identify areas for improvement.

We may combine personal data we collect from third parties with personal data you provide us to update, expand, or provide you with tailored information regarding our products, services, and events.

3. Data we collect as you navigate through the Website.

As is true of most websites, we gather certain data automatically. This data may include Internet protocol ("IP") addresses, browser type, Internet service provider ("ISP"), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics), operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site.

APAR and its third parties use cookies or similar technologies to analyze trends, administer the Website, track users' movements around the website, and to gather demographic data about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service. You can also manage your preferences for the Website's cookies by using the Cookie Preference Centers found in the Website's cookie banners.

How We Use Your Personal Data

We may use personal data that we collect about you for the following purposes among others :

- To operate, maintain, and improve our Website.
- To communicate with you about events or register you for events you sign up for with us.
- To process and answer your inquiries or to contact you to answer your questions and/or requests;
- To authenticate the identity of individuals contacting us by telephone, electronic means or otherwise;
- For internal training and quality assurance purposes;
- To provide you access to our corporate offices/ plants/ units/ branches/ registered office and other offices.
- To provide you with information, products, communication, or services that you request from us.
- To carry out and perform our obligations and enforce our rights arising from any contracts, agreements and other arrangements entered into between you and APAR, including, but not limited to, our Website Terms of Use.
- To notify you about changes to our Website or obtain any required consent.
- To allow you to participate in interactive features of our Website, when you choose to do so.
- For industry analysis, benchmarking, analytics, marketing, and other business purposes.
- To track your browsing and email actions, such as the pages you visited over time, for analytics and advertising purposes.
- To contact you for marketing purposes, in accordance with your marketing preferences (e.g., we may use your personal data to contact you to further discuss your interests in our services and products or other events), including, but not limited to, promotional offers for our own or third parties' products or services. If you do not wish to receive our email marketing communication for promotional purposes, you may opt out by clicking on the "unsubscribe" or "opt out" link in the marketing e mails we send you.

- To comply with applicable laws, judicial requests/ orders from courts of competent jurisdiction, or exercising or defending legal rights.
- To prevent and detect fraud or other types of wrongdoing.
- To communicate with you about incidents, concerns, or questions that you submit to us.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For other lawful or legitimate purposes, which may be reasonably required for day-to-day operations.
- To promote the APAR brand, products, initiatives and values with marketing communications. APAR has a strong legitimate interest in promoting its brand, products, initiatives and values. In order to further such goals, we process personal data about our business contacts including existing and potential APAR clients, third parties and intermediaries APAR interacts with in the course of doing business. APAR may collect details about you including name, contact details and other information such as your job title, employer, of business interest and other business details. We may process such data using software or platforms which allow us to manage our client relationships. We collect directly or indirectly from you, or from third parties, such as business partners, data brokers, social networks, marketing companies, and publicly available sources such as social media sites where lawful to do so. In such cases, we will also comply with any additional restrictions imposed by the region in which your data was collected as well as the source of the data. When reaching out to you, we may do so through different channels, such as email, phone calls, post or any other means of communication such as through social media sites such as LinkedIn. We will only send electronic marketing communications to business contacts in a business-to-business context, where we have your prior consent or where it is otherwise lawful to do so in the jurisdiction you are located in. You can opt -out from receiving such communications at any time using the contact us form on apar.com or affiliate websites where you had given your personal data, writing to our Data Protection Officers or Head – Global Privacy Office (see section below) or by any other given method provided from time to time (for example: unsubscribe link included at the bottom of emails).

From time to time, we may use your name, quotes, pictures or videos to promote and amplify 'APAR' brand and activities. In any such case, you will receive appropriate additional information about the usage of your personal data.

- Some of the above-mentioned purposes may overlap and there may be several purposes which justify our use of your personal information & SPDI.

We may also partner with third parties to either display advertising on our Website or to manage our advertising on other sites. Our third parties may use technologies such as

cookies to gather data about your activities on the Website and other websites to provide you advertising based upon your browsing activities and interests. If you wish to not have this data used for the purpose of serving you interest-based ads, you may opt-out from many third parties through the Digital Advertising Alliance's self-regulatory opt-out. If you do not want your data collected with Google Analytics, you can install the Google Analytics opt-out browser add-on. To opt-out of Google Analytics, visit the Google Analytics opt-out page (located at <https://tools.google.com/dlpage/gaoptout>) and install the add-on for your browser. For more details, visit the "Google Analytics opt-out browser

If we need to process your personal data for an incompatible purpose not discussed in this Privacy Notice, we will provide notice to you and, if required by law, seek your consent. We may process your personal data without your knowledge or consent only where required by applicable law. Lastly, APAR does not subject you to automated decision-making.

How We Share Your Personal Data

APAR takes care to allow your personal data to be accessed only by those who need such access to perform their obligations, tasks and duties, and to third parties who have a legitimate purpose for processing or accessing it. As such, we may share your personal data as described in this Privacy Notice to the following categories of recipients:

- To our subsidiaries, affiliates, associates or their or our successors or assigns.
- To our contractors, business partners, service providers, and other third parties who require the data to assist us in supporting our business (e.g., third-party hosting facilities) or third parties with products and services that may be of interest to you, provided such parties provide at least the same level of privacy protection as is required of APAR. These companies are authorized to use your personal data only as necessary to provide these services to us.
- To a potential buyer (and its agents and advisors) in connection with any proposed merger, acquisition, or any form of sale or transfer of some or all of our assets (including in the event of a reorganization, dissolution or liquidation), in which case, personal data held by us about you will be among the assets transferred to the buyer or acquirer.
- To a third party under the following circumstances where we, in good faith,: (i) believe we are compelled by applicable law or regulation, judicial request from a court of competent jurisdiction, or another legal process or government authority; (ii) find it necessary to exercise, establish or defend our legal rights; (iii) seek to enforce or apply our Website Terms of Use or terms of any other agreement; (iv) seek to protect APAR' rights or property; (v) seek to protect APAR, our Customers, or the public from harm or illegal activities; (vi) seek to respond to an emergency which we believe, in good faith requires us to disclose data to prevent harm; or (vii) rely on

your consent. Further, they must process this personal data in accordance with this Privacy Notice and as permitted by applicable data protection laws and regulations.

Please note that we do not sell (as defined in applicable data protection and privacy laws) your personal data (and will not sell it without providing any required notices and/or opt-in/opt-out rights).

Legal Basis for Processing Personal Data

If you are a resident of the EEA, the UK, or Switzerland, our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the context in which we collect it. However, we will normally collect and/or process your personal data pursuant to one or more of the following legal bases:

- The processing is in our legitimate interests which do not override your data protection interests or fundamental rights and freedoms.
- The processing is necessary to perform a contract, agreements and other arrangements with you.
- The processing is necessary to comply with our legal obligations.
- We may also seek your consent to process or retain your personal data in certain, limited circumstances that we clearly identify to you.
- In some limited cases, we may need the personal data to protect your vital interests or those of another person; for example, we may need to share your personal data with third parties for security reasons (when we believe in good faith that disclosure is necessary to protect our rights, protect your or others' safety, to investigate fraud, or respond to a related government request).

If we ask you to provide personal data to comply with a legal requirement or to perform a contract, agreements and other arrangements with you, we will make this clear at the relevant time and let you know whether the provision of your personal data is mandatory or not (as well as the possible consequences if you do not provide it). Similarly, if we collect and use your personal data in reliance on our legitimate interests (or those of a third party) that are not listed above, we will make clear to you at the relevant time what those legitimate interests are. If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us using the contact details provided in the "Contact Information" section below.

Where Apar is in a contractual relationship with you (other than an employment relationship), your employer or your company, or is taking steps to enter into such a contractual relationship, we may need to process your personal data, usually limited to name, business contact details and job title in order to enter into and/or fulfill the obligations arising from the same contract, such as providing you or your employer or company with the services you have requested or

make use of the services that you or your employer or company are offering to us. We will also process such personal data for ancillary tasks related to our daily business activities, such as accounting, auditing, reporting (to regulators and authorities) and to comply with applicable regulations.

If you do not provide certain information when requested, it may delay or prevent us in replying to your queries and/or in letting you join our initiatives.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose and applicable law. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Security and Breach Notification

APAR maintains appropriate technical and organizational measures, including, but not limited to, reasonably designed administrative, physical, and technical safeguards, designed to protect the personal data obtained as discussed in this Privacy Notice from accidental or unlawful destruction, loss, alteration, unauthorized disclosure and access. APAR personnel, service providers, and contractors with access to personal data collected as discussed in this Privacy Notice are required to keep such personal data confidential and secure. APAR has a dedicated team responsible for monitoring and responding to security events, and it notifies applicable parties of security or privacy incidents and data breaches in accordance with its incident response procedures and applicable law.

Data Retention

Unless a longer retention period is required by law, we will retain your personal data for as long as is needed to fulfill the purposes outlined in this Privacy Notice, or for as long as we have a legitimate business interest that is not outweighed by your data protection interests or fundamental rights and freedoms. When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymize it or, if this is not possible (e.g., because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible. As such, we reserve the right to use such anonymous data for any legitimate business purpose without further notice to you or your consent.

Your Privacy Rights

Your rights in relation to your personal data how it is processed. You can exercise these rights at any point. We have provided an overview of these rights below together with what this entails for you.

Certain jurisdictions may provide you with privacy rights under applicable data protection or privacy law regarding your personal data. In particular, you may have the right to:

- be informed about your personal data
- access your personal data
- correct any personal data that is inaccurate
- have your personal data erased;
- restrict or suppress the processing of your personal data; obtain and reuse your personal data;
- object to the processing of your personal data;
- object to how your personal data is used in automated decision making, if applicable;
- lodge a complaint with a supervisory authority;

These rights may be limited and restricted amongst others, if fulfilling your request would reveal personal data about another individual, or if you ask us to delete personal data which we are required by law to keep or which we need to defend claims against us.

If we process your personal data in reliance upon your consent, you can contact us at any time to withdraw your consent.

To exercise any of these rights, please contact us by using the contact details under the “Contact Information” heading below.

We will respond to such requests in accordance with the requirements of applicable data protection laws. Please note that in order to fulfil your request, we may need you to provide certain personal data to verify your identity.

Apar shall not be responsible for the authenticity of the personal information or SPDI supplied by you.

How We Treat Do Not Track Signals

Various browsers (i.e., Internet Explorer, Chrome, Firefox, Edge, etc.) may allow a “do not track” (DNT) setting, which sends a signal to websites visited by an individual about their browser DNT setting. At this time, there is no general agreement on how companies, like APAR, should interpret DNT signals. Therefore, we do not currently commit to respond to DNT

signals. We will continue to monitor developments around DNT browser technology and the implementation of a standard.

Third-Party Websites and Applications

This Website may link to websites that are not owned or controlled by APAR. As such, this Privacy Notice does not apply to personal data collected on any third party site or by any third party application that may link to or be accessible from the Website. This Privacy Notice does not apply to personal data collected by our business partners, and other third parties or third party applications or services, even if this personal data is collected using our Website or at events.

Children

The Website is not directed to or intended to be used by anyone under the age of applicable law. We do not knowingly collect personal data from anyone under the age of applicable law. If you are under said age, please do not attempt to fill out our forms or send any personal data about yourself to us. If we learn that we have collected personal data from a child under said age, we will delete that data promptly.

If you are a child under the age where parental consent is required in your Country, you should review the terms of this Privacy Notice with your parent or guardian to make sure you understand and accept them. If we discover that we have collected personal data from a child without consent from a parent or guardian where such consent should have been obtained, we will delete that personal data as soon as practical. We sometimes use your personal data to carry out age verification checks and enforce any such age restrictions.

Changes to this Notice

APAR reserves the right to update or change this Privacy Notice from time to time. If we make material changes to this Privacy Notice, we will post it to our Website home page prior to or at the time of the change becoming effective. We ask that you review the Privacy Notice periodically to stay informed about any updates or changes that we may have made.

You can see when this Privacy Notice was last updated by checking the “Effective Date” displayed at the top of this Privacy Notice.

Additional Privacy Terms or Notices

In addition to this Privacy Notice, there may be specific campaigns or promotions which will

be governed by additional privacy terms or notices. We encourage you to read these additional terms or notices before participating in any such campaigns or promotions you would be required to comply with them if you participate. Any additional privacy terms or notices will be made prominently available to you.

Contact Information

To ask questions or comment or redress your grievances under this Privacy Notice and our privacy practices or if you need to update, change, or remove your personal data or exercise any other rights, the following personnel is nominated on behalf of the Company, the contact details of which are given below

- *Via Email:* privacy.governance@apar.com
- *Via Mail:* *Data Privacy Officer*

*APAR House, Bldg. no. 4 & 5, Corporate Park, V.N. Purav Marg, Chembur
Mumbai- 400 071. India*