

**Effective date:** March 19, 2018

## Who are we?

We are **HCL Technologies Ltd.** (“HCL”, “we” or “us”). Our registered address is **806, Siddharth, 96, Nehru Place, New Delhi- 110019, India.**

We at HCL are committed to safeguarding your privacy. This Privacy Policy describes how we may collect, use, share, and keep personal information about you. Please make sure you read this Privacy Policy carefully.

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## What does this Privacy Policy cover?

This Privacy Policy applies to our public-facing ‘HCL Tech’ branded websites and other online services and will be available by a link on all sites and services which it covers, what type of information about our websites’ users is gathered and tracked, and how the information is used, shared or otherwise processed offline. It also describes how cookies, web beacons and other technologies may be used in our services and software products. References to HCL websites, products and services in this Privacy Statement include apps, programs, and devices.

Other HCL websites, apps, or online services may collect and use personal information about you in a different way and so publish a different HCL Privacy Policy. We encourage you to take a moment to look at the applicable Privacy Policy, available by a link at the bottom of the homepage or as you download an app.

We may also ask you to register an HCLid, in which case you need to provide us with your name, email address, country location and other information if needed for the purpose for which you are asked to register. The HCLid serves to uniquely identify you when you visit our websites, have a request or order or use a product or service. For ordering of most services and products we require you to have registered an HCLid. Registration with HCLid may allow you to customize and control your privacy settings. Certain HCL products and services may require unique registration specifically for the purpose of providing these products or services. In such cases, registration details provided by you for a product or service will only be used for the specific purpose of providing you with that product or service.

In addition, some of our software products and HCL Cloud services include technologies that allow HCL to collect certain information about the use of our products and services. We may also use such technologies to determine whether you've opened an e-mail or clicked on a link contained in an e-mail. For details regarding the technologies we employ, see Cookies, Web Beacon and Other Technologies below.

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# What is in this Privacy Policy?

- What personal information do we collect?
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  - How do we use your personal information?
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  - Where do we keep your personal information?
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## What personal information do we collect?

For the purposes of this Privacy Policy, references to 'personal information' mean any information relating to an identified or identifiable individual. Examples of personal information may include, for example, your name, your contact details or your location.

We collect information that you supply to us when you choose to contact us for more information or when you register for one of our websites or online services. You may supply the information directly to us or indirectly by using your credentials from third parties such as LinkedIn or Facebook. This information typically includes your name, professional credentials, email address and other contact data. We may append information from other sources, such as Google Analytics, to supplement what you give us. We do, on occasion, obtain or license contact information from third parties for limited marketing purposes, such as maintaining an accurate marketing database.

We gather date, time and certain additional information about a user's browser and system or device configuration and capabilities, navigation history and IP address for all visitors to our web sites. We may use this information for our internal security audit log, for trend analysis and system administration and to gather broad information about our audiences. When you submit information through a form on one of our websites, we capture and store your IP address and email address. We use this information for website personalization purposes.

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## Do we use cookies?

We use cookies and other commonly used data collection technologies on our websites and in our newsletters and emails to collect information on both an aggregate and individual basis. Please see our [Cookies Policy](#) for more details on how we use cookies and how to control cookies or their use for targeted advertising or marketing.

As mentioned above, we collect information from your visits to our websites and your use of our software products to help us gather statistics about usage and effectiveness, personalize your experience, tailor our interactions with you, and improve our products and services. We do so through the use of various technologies, including scripts, tags, Local Shared Objects (Flash cookies), Local Storage (HTML5) beacons, and "cookies".

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## How do we use your personal information?

We may use personal information we collect to:

- provide and administer our services;
  - understand our audience and improve how our websites work;
  - contact you and answer your questions;
  - market and advertise our products and services to you;
  - allow you to publish comments and participate in professional web-based forums;
  - keep our systems, users, employees and services safe
  - provide you with the information or support you requested.
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## How long do we keep your personal information?

We keep your personal information for so long as is necessary in light of the purpose for which it was originally collected or lawfully further processed. The criteria we use to determine the period of time for which your personal information may be kept include:

- the nature and type of personal information that you provide to us;
- the purpose for which you provide your personal information to us; and
- necessary business and operational requirements to continue to supply you with the services or functionality you have requested.

We may retain your information for a longer time period if we are required to do so by law.

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# How do we share your personal information?

We may disclose personal information about you to third parties, including:

- to other members of the HCL group of companies;
- to vendors that work on our behalf;
- to law enforcement when we have a good-faith belief that it is necessary to comply with a court order, ongoing judicial proceeding, or other legal process served on us;
- to exercise our legal rights or defend against legal claims; and
- to protect human safety or our networks or property, or as part of a sale or merger of our company or business assets.
- Fulfilling your Transaction Request: If you request something from HCL, for example, a product or service, or a callback, or specific marketing materials, we will use the personal information you provide to fulfill your request. To help us do this, we may share information with others, for instance, HCL's business partners, financial institutions, shipping companies, postal or government authorities, such as customs authorities, involved in fulfillment.
- Providing Support: We may use your personal information to support products or services you have obtained from us, such as notifying you of a product update or fix. We may combine your information with information from other interactions with you to provide you with more valuable suggestions in relation to product support. We also provide "Live Chat" sessions on our websites to assist you while you're navigating through our sites or forums where problems can be raised and solutions proposed; we will use personal information you provide in these sessions or in such forums in accordance with this Privacy Statement. In the course of providing technical support to you, we may sometimes have incidental access to data that you have provided to us or data that is located on your system. This data may contain information about you, your organization's employees, customers, partners, or suppliers. This Privacy Statement does not apply to our access to or handling of this personal information; the conditions regarding the handling and processing of this data is covered by the applicable Terms of Use or other agreements between you and HCL, such as the Terms of Use for Exchanging Diagnostic Data. Some HCL websites and software products may also use web beacons or other technologies to better tailor those sites to provide better customer service. These technologies may be in use on a number of pages across HCL's websites. When a visitor accesses these pages, a non-identifiable notice of that visit is generated which may be processed by us or by our suppliers. These web beacons usually work in conjunction with cookies. If you don't want your cookie information to be associated with your visits to these pages or use of these products, you can set your browser to turn off cookies or turn off cookies in the product itself, respectively. If you turn off cookies, web beacon and other technologies will still detect visits to these pages; however, they will not be associated with information otherwise stored in cookies.
- For more information about the technologies employed by our services HCL and software products, including how to turn them off, please consult the user guide for the particular software product or HCL services you are using. For information about how HCL clients may use cookies and other technologies in their own implementation of HCL software products

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## Where do we keep your personal information?

We collect, store, and process information on servers around the world and may access that information globally. If you are located in the European Union, please note that your personal information may be transferred out of, or stored outside, the European Economic Area. The privacy protections in these jurisdictions may not be equivalent to those in Europe. We will take steps to ensure that your personal information continues to be protected through adequate safeguards, copies of which are available from us on request at the email address below.

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## What rights do you have in relation to your personal information?

European law gives individuals a number of rights in relation to their personal information. These include the right to access, and in some circumstances to amend, delete, or restrict the continued processing of, personal information. Please note that deleting your information or restricting the continued processing of your information may limit our ability to continue to provide our websites, applications, and online services to you.

You also have a choice about:

- **Whether to receive email marketing messages from us.** You may opt out of our email marketing lists by following the opt-out directions at the bottom of our promotional emails. Please note that we have a number of brands and products and allow you to opt out selectively. To remove a specific email address from all HCL email marketing, send a request to [unsubscribe@hcl.com](mailto:unsubscribe@hcl.com)
- **Whether to share information about yourself and your use of our sites with third parties including social media sites.**
  - If you join one of our online communities, such as <https://straighttalk.hcltech.com>, your comments as well as certain information about you may be visible to other members of the community. Please take a moment to understand how each forum works and what choices you have.
  - If you use credentials from a third party, like Facebook, to register, then that third party will also record the fact that you have registered for our sites and may use that information consistent with its own privacy statements and practices. If you use Share, Like or similar social media buttons, those actions may be posted elsewhere (such as on the relevant social media sites).

- **Whether to allow certain uses of cookies and other data collection technologies.** Please see our [Cookies Policy](#).

If you have any questions about your rights, please email us at [privacy@hcl.com](mailto:privacy@hcl.com)  
You can also contact your local Data Protection Authority.

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## How do we safeguard your personal information?

We use a range of security measures to protect your personal information. Please be aware, however, that HCL cannot guarantee that third parties will safeguard your personal information in a similar manner. Unencrypted information - including information sent via E-mail - may also be able to be read by third parties. As a user of our services, you are responsible for protecting the information you provide, including user name and passwords, from misuse, by encryption or other means.

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## How will we update this Policy?

We are constantly working to develop new services. We may also change our practices over time as our business and technology evolve, and this may involve changes to the ways in which we collect, process and use your information. As a result, we may amend this Privacy Policy from time to time.

If we materially change our Privacy Policy, we will take steps to inform you of the change. We may do this through email, SMS, notices on our websites or other means (or a combination of these means). If you continue to use our websites, applications, and online services after the date any revised Privacy Policy comes into effect, you will be deemed to have read and agreed to the revised Privacy Policy.

The “Effective Date” at the top of this Privacy Policy shows when it was last updated.

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## Other important information

Our sites contain links to other websites not owned by HCL. We do not control the content or privacy practices of those sites.

Our websites and offerings are directed to people in their business or professional capacities.

They are not intended for children under 13 years of age. We do not knowingly solicit information online from, or market online to, children under 13 years of age.

We process personal information on the basis of your consent. You have the right to withdraw consent at any time, but this will not affect any prior processing of your personal information.

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## How can you contact us about this Policy?

For questions regarding this Privacy Policy, practices of the website, or any other privacy issue, please send an email to our Data Protection Officer at [privacy@hcl.com](mailto:privacy@hcl.com) or contact us at the address below:

If you are located in Americas: Privacy & Data Protection Office, HCL America Inc., 623 5th Avenue, 19th Floor, New York, NY 10022;

or

If you are located within the European Union, Middle East and Africa: HCL (Ireland) Information system Limited, 43-46 Marlborough Street, Dublin D01N279, Ireland

If you are located in APAC: Privacy & Data Protection Office, HCL Technologies Limited, Plot No 3A, Sector 126, Noida – 201303, Uttar Pradesh, India

Additionally, the contact information for the Grievance Officer for India is: Fabrizio Venturelli, Privacy & Data Protection Office. Contact: [grievance-india@hcl.com](mailto:grievance-india@hcl.com)