

PRIVACY STATEMENT

Effective date: October 22, 2020

Who are we (data controller)?

We are HCL Technologies Ltd., having its registered office at 806, Siddharth, 96, Nehru Place, New Delhi, 110019, India and one of its corporate offices at Technology Hub, SEZ Plot No 3A, Corporate Towers, Sector 126, Noida – 201304, U.P., India, and including its subsidiaries and affiliated entities (hereinafter “HCL”, "we" or "us"). Our EU representative is HCL Technologies Ltd. (Ireland Branch), Telephone House, 43-46 Marlborough Street, Dublin, Ireland.

What does this Privacy Statement cover?

This Privacy Statement applies to our public-facing HCL branded websites and other online services and will be available by a link on all sites and services which it covers. Other HCL websites, apps, or online services may collect and use personal information about you in a different way and so will have a different HCL Privacy Policy / Privacy Statement. We encourage you to take a moment to look at the applicable Privacy Policy / Privacy Statement, available by a link at the bottom of the homepage or as you download an application. Our sites contain links to other websites not owned by HCL and 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.

Please note, for purpose of this Online Privacy Statement, personal information means data or set of data that can identify an individual, such as name, address, telephone number, and email address.

What personal data do we collect and how do we intend to use it?

- Data collected through cookies and similar technologies** (*for more details, including any third-party plug-ins please visit our Cookie Policy*) – please note that based on local laws we might be required to obtain your prior consent (*opt-in*) or provide you with *opt-out* (right to object or to say no) for using certain types of cookies and similar technologies and/or for sharing data with third parties – upon visiting our website you will be provided with a customized cookie consent tool to make such choices as might be applicable:
 - Type of data:** IP address and related information such as location and internet provider, browser and content type, version and settings, viewed content and activities.
 - Purpose:** maintaining our websites, general statistics and measurement of effectiveness of our websites and marketing techniques, marketing.
 - Legal basis:** the legal basis may differ depending on local laws applicable, but generally we consider that our legitimate interests justify the processing unless you specifically

consent to some type of processing; we find such interests to be justified considering that the data is limited to browsing activities related to what is considered business or professional related (our website does not offer any content directed to individual consumers as well as any content which might be used for any inferences about your private life habits or interests), we provide easy opt-out and limit the retention of data before it is anonymized or deleted, data is also aggregated or pseudonymized unless for activities linked to submitting any webforms which might be linked to your identity submitted through such form.

- d. **Retention time:** for details of expiration of cookies/similar technologies please visit our Cookie Policy, other data will be anonymized or deleted within 14 months; for data directly linked to submitting a webform please visit section 2 below.
- e. **Source of data:** data is obtained automatically through your use of the website and from external parties such as Google Analytics (for more details please visit our Cookie Policy)..
- f. **Requirement to provide data and consequences of not providing:** you are not required to provide any data yourself.
- g. **Your rights:** your rights may differ depending on local laws applicable, but generally (as far as applicable laws provide you with such rights) you would be entitled to: withdraw your consent at any time (which shall not affect the lawfulness of processing based on consent before its withdrawal), object to the processing of personal data, access your data and have inaccurate data corrected, obtain a copy of personal data (in some cases in portable format), ask us about any relevant details of processing, ask for erasure or restriction of processing, and to lodge complaints with relevant authorities (in particular in the country where you live, work or where the alleged infringement took place). Please note that you can always opt-out from processing (object to processing) and request us to delete your data by submitting your request through our Data Subject Request Portal and we will only refuse if we have a compelling legal justification to keep the data; if you are a California resident (in the United States) please visit the following link for more details about your rights.

Please note that you can always **opt-out** from processing (object to processing) and request us to delete your data by submitting your request through our [Data Subject Request Portal](#) and we will only refuse if we have a compelling legal justification to keep the data; if you are a **California** resident (in the United States) please visit the following [link](#) for more details about your rights.

You will also not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

- h. **Data recipients and transfers:** HCL employees from the relevant teams, companies processing the data on our behalf (including for technical, software and marketing support), independent third parties (for more details please visit our Cookie Policy). Depending on applicable local laws you may obtain from us further information about specific entities having access to the data. Your data will be directly transferred to India (we also use US based providers) and any subsequent transfers will follow applicable local and regional laws. For data transferred outside of EU/EEA, HCL also implements EU standard contractual clauses (more information about such clauses is available [here](#)) to ensure similar level of protection as in EU/EEA.

2. **Data collected through webforms and when you contact us directly:**

- a. **Type of data:** depending on the webform and content of your communication to us, this includes business contact details, content of your communication, information you have received and about interactions with us, as well as information about how you use our website, interests in our products and services, and any publicly available information relevant from a b2b perspective (such as public information about the company you represent and your official position).
- b. **Purpose:** to provide you with requested information and respond to your queries as well as for direct marketing of our services and products.
- c. **Legal basis:** the legal basis may differ depending on local laws applicable, but generally we consider that our legitimate interests justify the processing unless and until you ask us to provide specific services or products, in which case existing or intended contract provides a legal basis; we find such interests to be justified considering that the data is limited to what is usually shared by the people acting in their business or professional capacities and we provide easy opt-out (we will only refuse deleting your data if we have a compelling legal justification to keep them).
- d. **Retention time:** 2 years since the last interaction, unless the existing contract, legal claim or legal requirement justifies further processing of which you will be informed (data will be reviewed annually and data which is not relevant will be deleted).
- e. **Source of data:** the data is provided by you directly, through interactions with our company and websites, and from publicly available sources of business-related information.
- f. **Requirement to provide data and consequences of not providing:** some fields are marked necessary in our webforms in order to submit such forms, not providing such data will result in no ability to submit a form and to obtain required information; in case some data is necessary because of requested services or products or to enter into contracts, you will receive such information separately.
- g. **Your rights:**
 - Your rights may differ depending on local laws applicable, but generally (as far as applicable laws provide you with such rights) you would be entitled to: object to the processing of personal data, access your data and have inaccurate data corrected, obtain a copy of personal data (in some cases in portable format), ask us about any relevant details of processing, ask for erasure or restriction of processing, and to lodge complaints with relevant authorities (in particular in the country where you live, work or where the alleged infringement took place).
 - Please note you can always **unsubscribe** to marketing communication through clicking **unsubscribe** links available in the marketing communication(s) you receive. In addition to that, irrespective of applicable laws, you can **opt-out** from processing (object to processing) and request us to delete your personal data by submitting your request through our [Data Subject Request Portal](#) and we will work with you to delete your personal information.
 - You will not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. Limited profiling and business classification might be used, as for type and size of business, number of employees, business role, interests etc.

- The following rights are dependent on the geographical location of the website visitor:
 - If you are a California resident, please visit the following [link](#) for more details about your rights.
 - If you are a resident of Canada, you may please submit your request through our [Data Subject Request Portal](#) for exercising your rights under the Individual Access principle of Personal Information Protection and Electronic Documents Act ('PIPEDA'), if applicable. Alternatively, you may also contact the Privacy Office at privacy@hcl.com for any question or complaint regarding your personal information under PIPEDA
 - If you are a resident of Mexico, you may please submit your request through our [Data Subject Request Portal](#) for exercising your rights of access, correction and cancellation ('ARCO rights') under the Federal Law on Protection of Personal Data held by Private Parties ('Law'). In alternative, you may also contact the Privacy Office at privacy@hcl.com for any question or complaint regarding your personal data, as applicable.
 - If you are a resident of Brazil, please contact the Privacy Officer for the Americas, at hcldp@hcl.com, for any question or complaint regarding your personal data, and you may submit your request through our [Data Subject Request Portal](#) for exercising any other right(s) under the Law No. 13,709, as applicable.
- h. **Data recipients and transfers:** HCL employees from the relevant teams, companies processing the data on our behalf (including for technical, software and marketing support), independent third parties when this is necessary (auditors, lawyers, inspection agencies) or based on your choices and actions (as when you ask us to send you a shipment or letter using a third-party provider). Depending on applicable local laws you may obtain from us further information about specific entities having access to the data. Your data will be directly transferred to India (we also use US based providers) and any subsequent transfers will follow applicable local and regional laws. For data transferred outside of EU/EEA, Argentina, or Brazil, HCL also implements EU Standard Contractual Clauses (more information about such clauses is available [here](#)) to ensure similar level of protection as in EU/EEA.

Legal Disclaimer

In certain situations, HCL may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security requirements as well as instances requiring co-operation with law enforcement agencies where mandated by law.

As further required by Law (including mergers, acquisitions, divestitures, or asset sales, but only if the acquiring organization agrees to this Privacy Statement's protections), we may also disclose your personal information as required by law, such as to comply with a subpoena or other legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

How do we safeguard your personal data?

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 data 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. If you have any questions about the security of your personal data, you can contact us at privacy@hcl.com.

How to contact us if you have any questions:

If you have any questions about this Privacy Statement then you can contact the Global Privacy Office online via privacy@hcl.com

If you are located within Americas: Global Privacy Office, HCL America Inc., 623 5th Avenue, 19th Floor, New York, NY 10022.

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

If you are located within APAC: Global Privacy 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 Prashant Yadav, Global Privacy Office; e-mail address - grievance-india@hcl.com

If you are in the European Union you can also contact our EU Data Protection Officer at hclppo@hcl.com.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

How will we update this Privacy Statement?

We may amend this Privacy Statement from time to time.

If we materially change our Privacy Statement, 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) in line with the permission you have given us to contact you.

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