

PRIVACY POLICY

Bajaj Electricals Limited (“**BEL**”) and subsidiaries (“**we**”, “**us**” and “**our**”) are committed to protecting the privacy of the user assessing the Application (“**You**”). This Privacy Policy (“**Policy**”) describes our practices in connection with information privacy on Personal Data we process through your individual use of the Bajaj Smart Platform:

This Privacy Policy explains how and why your Personal Data is collected, through the use of our Application. You agree that your use of the Application implies your consent to the collection, retention and use of your Personal Data in accordance with the terms of this Policy. We reserve the right, at Our sole discretion, to change, modify or otherwise alter this Policy at any time without prior notice. Such changes and/or modifications shall become effective immediately upon being posted/published on the Application herein.

This Policy is to be treated as an electronic form of contract under the Information Technology Act, 2000 and the rules made thereunder, as may be amended, re-enacted or substituted from time to time. This Policy does not require any physical, electronic or digital signature and is a legally binding document between You and Us.

The Privacy Policy shall at all times be read with the Terms of Use.

All capitalized terms that have not been specifically defined herein shall have the same meaning as provided under the Terms of Use.

Please read the privacy policy carefully. By using the Application, you indicate that you understand, agree and consent to this Policy. If you do not agree with the terms of this Policy, please do not use this Application.

Providing information to Us is Your choice. You understand that any data, information, content or information that You post, submit or upload to the Service shall be visible to other Users of the Service and will be stored on Company’s servers for the purposes of making the Service available to You. We advise You to be selective about what information You post. Please do not post, submit or upload to the Service any data, information, content or information which would include any Personal Information and Sensitive Personal Data or Information that You do not wish to be made available to BEL or to the public at the large.

1. DEFINITIONS:

- 1.1. “**Application**” shall mean “Bajaj Smart Platform” application as may be downloaded from the Platform.
- 1.2. “**Personal Data/Information**” shall mean any information that identifies or can be used to identify, contact or locate the person, to whom such information pertains, including, but not limited to, name, address, date of birth, phone number, fax number, email address, PAN, Aadhaar number, driving license/ passport/ voter identity card/ government issued identification card, e-KYC, demographic information, photographs, biometric information, digital signature keys, bank account, credit/debit card information, physical, physiological or mental health condition, medical records and history, passwords etc.
- 1.3. “**Platform**” refers to any store/application from where the Application can be downloaded including but not limited to Apple Store, iOS store, google play, play store etc.
- 1.4. “**Smart Devices**” refers to those nonstandard computing devices produced or manufactured by hardware manufacturers, with human-machine interface and the ability to transmit data that connect wirelessly to a network, including: smart home appliances, smart wearable devices, smart air cleaning devices, etc.

2. WHAT PERSONAL INFORMATION ABOUT CUSTOMERS DOES THE APPLICATION GATHER?

2.1. Information you voluntarily provide us

- 2.1.1. Account or Profile Data: When you register an account with us, we may collect your contact details, such as your name, email address, postal address, telephone or mobile number, gender date of birth, PAN, personal information stored with third parties such as social media sites (such as Facebook or Twitter), photographic identification and proof of address documents (to carry out due diligence), banking and financial details (to establish the source of funds where a transaction is involved), your account login details, such as your username and password. During your interaction

with our Products, we may further collect your nickname, profile picture, country code, language preference or time zone information into your account.

- 2.1.2. Feedback: When using feedback and suggestion features in our Application, we may collect your email address, mobile phone number and your feedback content to address your problems and solve device failures on a timely basis.

2.2. **Information We Collect Automatically**

- 2.2.1. Device Information: When you interact with our Application, we automatically collect device information, such as the MAC address of your devices, IP address, wireless connection information, operating system type and version, application version number, push notification identifier, log files, and mobile network information. We may collect information to track your behaviour and pattern while using our Application.
- 2.2.2. Usage Data: During your interaction with our Application, we automatically collect usage data relating to visits, clicks, downloads, messages sent/received, and other usage of our Sites and Services.
- 2.2.3. Log information: When you use our Application, the application and exception log may be uploaded.
- 2.2.4. Location Information: We may collect information about your real-time precise or non-precise geo-location when you use our specific Application, such as robot cleaner and weather service.

2.3. **Smart Devices Related Information**

- 2.3.1. Basic information of Smart Devices: When you connect your Smart Devices with our Application, we may collect basic information about your Smart Devices such as device name, device ID, online status, activation time, firmware version, and upgrade information.
 - 2.3.2. Information reported by Smart Devices: Depending on the different Smart Devices you elect to connect with our Application, we may collect different information reported by your Smart Devices. For example, smart weights or fitness trackers may report your height, weight, body fat mass (BFM), BMI and skeletal muscle mass (SMM); smart cameras may report images or videos captured by it.
- 2.4. Financial Information: If you transact with us, we collect some additional information, such as a billing address, a credit / debit card number and a credit / debit card expiration date and/ or other payment instrument details and tracking information from cheques or money orders.
 - 2.5. Communications: If you choose to post messages on our message boards, chat rooms or other message areas or leave feedback or if you use voice commands to shop on the Application, we will collect that information you provide to us. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law. If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Application, we may collect such information into a file specific to you.
 - 2.6. Behavioural Information: If you choose to buy on the Application, we collect information about your buying behaviour, preferences, and other such information that you choose to provide.
 - 2.7. Information from Other Sources: We might receive information about you from other sources and add it to our account information.

All information collected from your (including sensitive personal information) shall be referred to as the Information. By using or continuing to use the Application you agree to our use of the Information in accordance with this Policy, as may be amended from time to time by us. in its discretion. You also agree and consent to us collecting, storing, processing, transferring and sharing Information related to you with third parties or service providers for the purposes as set out in this Policy. All such collection, storage, processing, transfer and sharing of the Information will be as per the applicable laws prevalent in India.

3. **USE OF DEMOGRAPHIC / PROFILE DATA / YOUR INFORMATION**

- 3.1. Provide services: We use Information to provide the services you request in the Application. We use your Information in handling and fulfilling orders, enhancing customer experience, resolve disputes; troubleshoot problems; help promote a safe service; collect money; measure consumer interest in our products and services, inform you about online and offline offers, products, services, and updates; customize and enhance your experience; detect and protect us against error, fraud and other criminal activity; enforce our terms and conditions; and as otherwise described to you at the time of collection.
- 3.2. Improve Our Services: We may process Personal Data and other information collected from you, to develop and improve our Application, to analyse the efficiency of our operations, and to prevent and trace fraudulent or inappropriate usage. The legal basis for this processing is to perform our contract with you according to our Terms of Use.
- 3.3. Non-marketing Communication: We may process Personal Data and other Information collected from you to send you important information regarding various job openings in our organization, changes to our terms, conditions, and policies and/or other administrative information. The legal basis for this processing is to perform our contract with you according to our Terms of Use.
- 3.4. Analysis: In our efforts to continually improve our product and service offerings, we and our affiliates collect and analyse demographic and profile data about our users' activity on our Application.
- 3.5. Diagnosis: We identify and use your IP address to help diagnose problems with our server, and to administer our Application. Your IP address is also used to help identify you and to gather broad demographic information.
- 3.6. Marketing Communication: We may process your Personal Data to provide marketing and promotional materials to you on our Products and Services. If we do so, each communication we send you will contain instructions permitting you to opt-out of receiving future communications of that nature. The legal basis for this processing is your consent. Additionally, if you consent to participate in our lottery, contest or other promotions, we may use your personal data to manage such activities.
- 3.7. Personalization: We may process your account and profile data, usage data, device information to personalize product design and to provide you with services tailored for you, such as recommending and displaying information and advertisements regarding products suited to you, and to invite you to participate in surveys relating to your use of our Products. The legal basis for this processing is your consent.
- 3.8. Legal Compliance: We may process your personal data as we believe to be necessary or appropriate: (a) to comply with applicable laws and regulations; (b) to comply with legal process; (c) to respond to requests from public and government authorities (d) to enforce our terms and conditions; (e) to protect our operations, business and systems; (f) to protect our rights, privacy, safety or property, and/or that of other users, including you; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- 3.9. Surveys: We will occasionally ask you to complete optional online surveys. These surveys may ask you for personal information, contact information, date of birth, demographic information (like zip code, age, or income level), attributes such as your interests, household or lifestyle information, your purchasing behaviour or history, preferences, and other such information that you may choose to provide. We use this data to tailor your experience at our Application, providing you with content that we think you might be interested in and to display content according to your preferences.
- 3.10. We may combine your Personal Information with information collected from tracking technologies and aggregate it with information collected from other Users using the Service to attempt to provide You with the services and a better experience on the Service. You understand, agree and acknowledge that Our collection, storage and processing of Your personal information is for a lawful purpose connected with the functioning of the Service. You hereby consent to the collection, storage, use, disclosure, transfer, processing of the personal information for the purposes set out herein.

4. DOES BEL SHARE THE INFORMATION IT RECEIVES?

- 4.1. Information about our customers is an important part of our business and we are not in the business of selling it to others. BEL shares customer information only as described below.
 - 4.1.1. Businesses associates We Do Not Control: We work closely with businesses associates. These businesses may be operating stores. We may provide services jointly with or on behalf of these businesses' associates.
 - 4.1.2. Third Party Service Providers: We employ other companies and individuals to perform functions on our behalf. Examples include fulfilling orders, delivering packages, analysing data, providing

marketing assistance, processing credit card payments and providing customer service. They have access to the Information needed to perform their functions, but may not use it for other purposes. Further, they must process the personal information in accordance with this Privacy Policy and as permitted by applicable law.

- 4.1.3. Business Transfers: As we continue to develop our business, we might sell or buy stores, subsidiaries or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Policy (unless, of course, the customer consents otherwise). Also, in the unlikely event that BEL or substantially all of its assets are acquired, customer information will of course be one of the transferred assets.
- 4.1.4. Protection of BEL and Others: We release account and other personal information when we believe release is appropriate to comply with applicable law; enforce or apply our Terms of Use and other agreements; or protect the rights, property or safety of BEL, our users or others. This includes exchanging information with other companies, organisations, government or regulatory authorities for fraud protection and credit risk reduction. Obviously, however, this does not include selling, renting, sharing or otherwise disclosing personally identifiable information from customers for commercial purposes in a way that is contrary to the commitments made in this Privacy Policy
- 4.1.5. Law Enforcement: We may be required to share the aforesaid Information with government authorities and agencies for the purposes of verification of identity or for prevention, detection or investigation, including of cyber incidents, prosecution and punishment of offences. You agree and consent for BEL to disclose your information, if so required, under applicable law.
- 4.1.6. Legal Process: We may disclose personal information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to respond to subpoenas, court orders, or other legal process.
- 4.1.7. With your consent: Other than as set out above, you will receive notice when information about you might go to third parties and you will have an opportunity to choose not to share the information.

Except for the third parties described above, to third parties only with your consent.

5. HOW SECURE IS INFORMATION ABOUT YOU?

- 5.1. Our Application has stringent security measures in place to protect the loss, misuse, and alteration of the information under our control. Whenever you change or access your account information, we offer the use of a secure server. Once your information is in our possession, we adhere to strict security guidelines, protecting it against unauthorized access.
- 5.2. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal information (including sensitive personal information). Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- 5.3. It is important for you to protect against unauthorised access to your password and to your computer. Be sure to sign off when you finish using a shared computer. [Click here for more information on how to sign off.](#)
- 5.4. Please understand that while we strive to protect your Personal Information, TRANSMISSION OF INFORMATION OVER THE INTERNET IS NOT COMPLETELY SECURE AND THERE ARE RISKS ASSOCIATED WITH IT. ALTHOUGH WE STRIVE TO PROTECT YOUR PERSONAL INFORMATION, WE CANNOT GUARANTEE THE SECURITY OF THE SAME WHILE IT IS BEING TRANSMITTED TO OUR SERVICE AND ANY TRANSMISSION IS AT YOUR OWN RISK.

6. YOUR RIGHTS RELATING TO YOUR PERSONAL DATA

We respect your rights and control over your Personal Information. You may exercise any of the following rights by emailing us at consumercare@bajaelectricals.com

Request access to the Personal Data that we process about you;

- Request that we correct inaccurate or incomplete personal Information about you;
- Request deletion of Personal Data about you;
- Request restrictions, temporarily or permanently, on our processing of some or all Personal Data about you;

- Request transfer of Personal Data to you or a third party where we process the data based on your consent or a contract with you, and where our processing is automated; and
- Opt-out or object to our use of personal data about you where our use is based on your consent or our legitimate interests.
- Request clarification related to this Policy.

You do not have to pay a fee and we will aim to respond you within 30 days. If you decide to email us, in your request, please make clear what information you would like to have changed, whether you would like to have your personal information deleted from our database or otherwise let us know what limitations you would like to put on our use of your personal information. Please note that we may ask you to verify your identity before taking further action on your request, for security purposes.

7. INFORMATION SECURITY SAFEGUARDS

We use commercially reasonable physical, administrative, and technical safeguards to preserve the integrity and security of your personal information. BEL provides various security strategies to effectively ensure data security of user and device. As for device access, BEL proprietary algorithms are employed to ensure data isolation, access authentication, applying for authorization. As for data communication, communication using security algorithms and transmission encryption protocols and commercial level information encryption transmission based on dynamic keys are supported. As for data processing, strict data filtering and validation and complete data audit are applied. As for data storage, all confidential information of users will be safely encrypted for storage. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem by legal@bajajelectricals.com

8. INFORMATION RETENTION PERIOD

We process your Personal Data for the minimum period necessary for the purposes set out in this Policy and in compliance with the applicable laws, unless there is a specific legal requirement for us to keep the data for a longer retention period. We determine the appropriate retention period and such period may not extend more than 10 years (unless permitted by applicable laws) based on the amount, nature, and sensitivity of your Personal Data, and after the retention period ends, we will destruct your Personal Data. When we are unable to do so for technical reasons, we will ensure that appropriate measures are put in place to prevent any further such use of your Personal Data.

9. THIRD-PARTY WEBSITES

This Application may contain links to other services owned and operated by third parties which are not under the control of the Company ("Third-Party Websites") which are not under the control of BEL. Any service you visit by a link from the Third Party Websites is solely the responsibility of the third party providing the service. the content of, including materials and information contained on, any Third Party Website to which you link from the service is solely the responsibility of the provider of that third party service. Any transactions that you enter into with a third party listed in this service or linked from this service are solely between you and that third party. BEL is not responsible for any such third-party service, any products or services sold or provided by such third party services, nor the organizations publishing those third party services, and hereby disclaim any responsibility and liability for the same. The inclusion of any links does not constitute or imply an endorsement or recommendation by us of the third-party, of the quality of any product or service, advice, information or other materials displayed, purchased, or obtained by you as a result of an advertisement or any other information or offer in or in connection with the third party service. BEL shall not be liable, accountable or responsible for your Personal Information and/or sensitive personal data or information being used or misused by such third-party service. BEL is not responsible for the privacy practices or the content of those Third Party Websites.

10. CHANGES TO THIS POLICY

We may update this Policy to reflect changes to our information practices. If we make any material changes we will notify you by email (send to the e-mail address specified in your account) or by means of a notice in the

Application through a pop up notification which can be clicked and accepted to. We encourage you to periodically review this page for the latest information on our privacy practices.

11. LEGAL APPLICATION AND JURISDICTION

This Policy is formulated in accordance with the laws of India and shall be governed by the laws of India and any dispute in relation thereto shall be subject to exclusive jurisdiction of courts at Mumbai.

If you have any questions about our practices or this Privacy policy, please contact us as follows:

BAJAJ ELECTRICALS LIMITED
45-47 VEER NARIMAN ROAD, MUMBAI-400 001.
Email: consumercare@bajajelectricals.com

12. GRIEVANCE OFFICER

In accordance with the Information Technology Act, 2000 and the rules made thereunder, the name and contact details of the Grievance Officer are provided below in the event You have any questions or complaints regarding Our Privacy Policy or practices:

Name of Grievance Officer: Bajaj Customer Care
E-mail of Grievance Officer: consumercare@bajajelectricals.com
Contact No. of Grievance Officer: 022 - 4128 0000 (9.00 AM To 6.00 PM)

We are committed to providing a first response within 48 hours of receiving the complaint, and We aim to resolve all complaints within 3 (three) business days. Any delay in the resolution time shall be proactively communicated to You. If You do not hear back from Us within a week's time, please do write to Us at digiapp@bajajelectricals.com for escalation of your specific complaint to the relevant grievance redressal officer.

13. OUR LEGAL OBLIGATIONS

This Privacy Policy is published on the Platforms in compliance with Regulation 4 of the (Indian) Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011.

We are bound by the (Indian) Information Technology Act, 2000, and comply with all its provisions available at <https://meity.gov.in/content/information-technology-act-2000>. Under Section 43A of the (Indian) Information Technology Act, 2000, BEL and all its service providers are obliged to maintain reasonable security procedures to safeguard your Personal Information.

Under Regulation 5 of the Information Technology (Reasonable Security and Procedures and Sensitive Personal Data or Information) Rules, 2011, We are obliged to provide every user of the Platform with a readable copy of the Personal Information You have provided us. If You require a copy, do get in touch with Us at digiapp@bajajelectricals.com