

CEAT PRIVACY NOTICE

CEAT Ltd., 463, Dr. Annie Besant Road, Worli, Mumbai: 400 030, (“CEAT,” “we,” “our,” or “us”) values its customers and visitors to its websites and is committed to protecting your privacy and strives to provide you with a safe and secure experience. This Privacy Notice explains how your personal data is collected, used, disclosed or otherwise processed by CEAT as the controller responsible for processing your personal data. In this regard, personal data encompasses all personal data as defined in Art. 4 (1) of the European Data Protection Regulation (“GDPR”). This Privacy Notice applies to our website www.ceat.eu. Click on the links below to jump to each section:

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1. WHAT INFORMATION DO WE COLLECT?

The categories of information we collect can include:

- **If you visit our website.** Our log files may process the following information: IP address, browser data, browser type, device type, device ID, Uniform Resource Locators (URL), operating system, Media Access Control (MAC) address, advertising IDs, screen resolution, device manufacturer and model, version of the services you are using, app usage data, internet service provider, referring and exit pages, date/time stamp, clickstream data, language preferences, whether you access the Service from multiple devices, and other actions you take on the Sites (“General System Data”).

Apart from the automatically collected data as set out above, we may also process the following data:

- **If you request information on products or services.** We may collect your name, email address, mailing address, pincode (postal code), phone number, IP address, and other contact details as well as information on the requests and other communication contents.
- **If you sign up for promotional emails.** If you sign up for our mailing list, we will collect your email address, information on whether you are already a customer, marketing campaign information such as your reaction to our marketing, whether you open our marketing emails or click the links contained in these emails.

2. HOW WE COLLECT YOUR PERSONAL DATA

Your personal data is collected in many ways and may include:

- **Personal data you provide to us directly.** Personal data may be voluntarily submitted by you in the course of using our services, such as when communicating with us.

In this respect you are free to choose which information you want to provide to us or whether you want to provide us with information at all. However, some information, such as your name, address and information on your requested services may be necessary for the performance of our contractual obligations. Without providing this information, you will not be able to request or use certain services or enter into a contract with us.

- **Personal data collected via technology.** As you use our services, we may collect passive information in our log-files.

3. WHY DO WE COLLECT AND PROCESS YOUR PERSONAL DATA?

The reasons for using your personal data may differ depending on the purpose of the collection. Regularly we use your information for the following purposes and on the following legal justifications pursuant to the GDPR:

- **We use your information based on the need to perform a contractual or quasi contractual relationship.** When you reach out to us in order to request a service, we process your personal data for the purpose of rendering this service. You are free not to provide your personal data, however, we may then not be able to render the service.
- **We use your information if justified by our legitimate interests.** The usage of your information may also be necessary for our own business interests. For example, we may use some of your information to evaluate and review our business performance; conduct data analytics and fraud monitoring and prevention; develop new products, determine the effectiveness of our promotional campaigns, identify usage trends, create financial statements; improve our services or to identify potential cyber security threats, facilitate social sharing functionalities, and to personalize your experience on the services by presenting products and offers tailored to you. If necessary, we may also use your information to pursue or defend ourselves against legal claims.

If you are already a customer, we may use your email address and name for promotional emails relating to our services. You can object to this use at any time by clicking on the “unsubscribe link” provided in such communications or by contacting us using the contact details set out at the end of this Privacy Notice.

- **We use your information after obtaining your consent.** In some cases, we may ask you to grant us separate consent to use your information, such as when you sign-up to any of our newsletters or if you request the sending of promotional materials. You are free to deny your consent and the denial will have no negative consequences for you. You are free to withdraw your consent at any time with effect for the future. If you have granted us consent to use your personal data, we will use it only for the purposes specified in the consent form. Please note that to the extent our processing is based on your consent and you withdraw it, we may no longer be able to provide the related services.

This also includes our **promotional emails to the extent we cannot rely on opt-out**. If you sign up for our promotional e-mails, we will use your personal data to send you emails containing newsletters, promotions and special offers relating to our Service. You may unsubscribe from our email marketing at any time by clicking on the “unsubscribe link” provided in such communications or by contacting us using the contact details set out at the end of this Privacy Notice.

- **We use your information to comply with legal obligations.** We may be obligated to process personal data to comply with legal obligations (e.g., retain certain information according to tax or commercial laws).

We do not use your personal data for automated individual decision-making.

4. SHARING OF YOUR INFORMATION AND LEGAL BASIS FOR SHARING

We may share your personal data with:

- **Other group companies/distributors/dealers.** Local distributors/dealers and CEAT’ European affiliate. These individuals and companies will use your personal data in the same way as we can under this Privacy Notice or support our service (performance of contract/legitimate interest);
- **Purchasers and third parties in connection with a business transaction.** Other parties in connection with a CEAT transaction, such as a merger, sale of CEAT assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party, or in the event of a bankruptcy or related or similar proceedings (legitimate interest); and
- **Law enforcement, regulators and other parties for legal reasons.** Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Service or to protect the security or integrity of our Service; and/or (c) to exercise or protect the rights, property, or personal safety of CEAT, our visitors, or others (legal obligation/legitimate interest).

We may also share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

5. CONTROL OVER YOUR INFORMATION

How to control your communications preferences. You can stop receiving promotional email communications from us by clicking on the “unsubscribe link” provided in such communications or by

contacting us using the contact details set out at the end of this Privacy Notice. We make every effort to promptly process all unsubscribe requests. You may not opt out of service-related communications (e.g., account verification, transactional communications, technical and security notices).

6. YOUR RIGHTS

To the extent we offer our services to customers within the EU, you have the following rights in respect to your personal data that we hold:

- **Right of access.** The right to **obtain** access to your personal data.
- **Right to rectification.** The right to obtain rectification of your personal data without undue delay where that personal data is inaccurate or incomplete.
- **Right to erasure.** The right to obtain the erasure of your personal data without undue delay in certain circumstances, such as where the personal data is no longer necessary in relation to the purposes for which it was collected or processed.
- **Right to restriction.** The right to obtain restriction of the processing undertaken by us on your personal data in certain circumstances, such as, where the accuracy of the personal data is contested by you, for a period of time enabling us to verify the accuracy of that personal data.
- **Right to portability.** The right to portability allows you to move or have the personal data moved, copy or transfer personal data easily from one organization to another.
- **Right to Object.** IN SOME CASES YOU HAVE THE RIGHT TO OBJECT TO ANY PROCESSING BASED ON OUR LEGITIMATE INTERESTS WHERE THERE ARE GROUNDS RELATING TO YOUR PARTICULAR SITUATION. FURTHERMORE YOU CAN OBJECT TO MARKETING ACTIVITIES FOR WHATEVER REASON WHATSOEVER AT ANY TIME.

If you wish to exercise one of these rights, please contact us using the contact details set out at the end of this Privacy Notice.

- **Right to lodge a complaint.** You also have the right to lodge a complaint with an EU data protection **authority**. Further information about how to contact your local data protection authority is available at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. However, we encourage you to first reach out to us by using the contact set out at the end of this Privacy Notice so that you have an opportunity to address your concerns directly and find a solution together before you do lodge a complaint.

If you wish to exercise any of these rights, please contact us at customer care@ceat.com

7. HOW WE STORE AND PROTECT YOUR INFORMATION

We care about the security of your information and employ physical, administrative, and technological safeguards designed to preserve the integrity and security of all information collected through our Service. However, no security system is impenetrable, and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals

whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

We will retain your information as long as necessary for the purposes outlined in this Privacy Notice, and for a commercially reasonable time thereafter for backup, archival, fraud prevention or detection, or audit purposes, or as otherwise required by law.

If you signed up for our promotional emails, we will delete the respective data if you unsubscribe from receiving our promotional emails.

8. INTERNATIONAL DATA TRANSFER

Your information collected through our website will be stored and processed in the European Union and India. In particular if you are located in the European Union, please note that we will transfer personal data to India or a country and jurisdiction that does not have the same data protection laws as your jurisdiction and that does also not provide for an equivalent and adequate level of data protection as the country in which you usually reside in.

In other cases where we transfer information from the European Union to third parties outside the European Union and to countries not subject to schemes which are considered as providing an adequate data protection standard, we will either enter into contracts which are based on the EU Standard Contractual Clauses with these parties or ensure an adequate level of protection by other means.

If you wish to inquire further about the safeguards we use, please contact us using the details set out at the end of this Privacy Notice.

We will take reasonable steps to ensure that your personal data is treated securely and in accordance with applicable law and this Privacy Notice.

9. CHILDREN'S PRIVACY

CEAT does not knowingly collect or solicit any information from anyone under the age of 13 on this Service. In the event that we learn that we have inadvertently collected personal data from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from a child under 13, please contact us using the contact details set out at the end of this Privacy Notice. Visitors older than the age of 13, but younger than their country's legal age of majority are permitted to use and/or submit their Personal data only with parental supervision. We encourage parents and guardians to spend time online with their children and to participate and monitor the interactive activities of their children.

10. LINKS TO OTHER WEB SITES AND SERVICES

The Service may contain links to and from third-party websites of our business partners, advertisers, and social media sites and our users may post links to third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. We are not responsible for the privacy practices or the content on the websites of third-party sites.

11. HOW TO CONTACT US

If you have any questions about this Privacy Notice or the way we process your personal data or if you want to exercise your rights, please contact us at customercare@ceat.com or at:

CEAT Ltd.

ATTN: Privacy

Address:

463, Dr. Annie Besant Road

Worli, Mumbai: 400 030

India

13. CHANGES TO OUR PRIVACY NOTICE

We may modify or update this Privacy Notice from time to time to reflect the changes in our business and practices, so you should review this page periodically. When we change the policy in a material manner, we will let you know and update the 'last modified' date at the bottom of this page. If you object to any changes, you may close your account.

This Privacy Notice was last modified on 13.07.2022