

# **Privacy Policy**

## **Tata Teleservices Limited & its subsidiary companies (Hereinafter collectively referred as 'Tata Teleservices' or 'TTL')**

### **Objective:**

The objective of this Privacy Policy (the "Policy") is to protect the privacy of persons dealing with Tata Teleservices and to explain how We collect, use, disclose and store Information in accordance with the legal requirements and in order to mitigate operational risks.

### **Our Website:**

Tata Teleservices provides products and services via its various web sites. When you visit any such site, its web servers record anonymous information such as the time, date and URL of the request. This information assists Tata Teleservices to improve the structure of its web sites and monitor their performance.

Tata Teleservices may use 'cookies' on various web sites. Cookies are an industry standard and most major web sites use them. A cookie is a small text file that our web sites may place on your computer. Usually, cookies are used as a means for Tata Teleservices's web sites to remember your preferences. As such, cookies are designed to improve your experience of Tata Teleservices's web sites.

In some cases, cookies may collect and store personal information about you. Tata Teleservices extends the same privacy protection to your personal information, whether gathered via cookies or from other sources. You can adjust your Internet browser to disable cookies or to warn you when cookies are being used. However, if you disable cookies, you may not be able to access certain areas of our web sites or take advantage of the improved web site experience that cookies offer.

Tata Teleservices also collects Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. Tata Teleservices collects and manages IP addresses as part of the service of providing internet session management and for security purposes.

### **Assurance of Privacy:**

Your privacy is of utmost importance to us and we at Tata Teleservices hereby assure you that we enforce the highest levels of confidentiality and security. We seek to comply with all currently applicable legislation regarding the protection, security and confidentiality of personal data. In this Policy, we describe how we collect, use, disclose and protect personal data. We also outline the rights you may have in respect of your personal data held by us. The Policy relates to your personal data that we may access through your use of this website and in relation to any contract for goods or services or other commercial relationship we may have with you, or with anyone who provides you with access to any of our products and services (such as your employer) that may collect, store or otherwise process your personal data.

When you provide any information to us which may include sensitive personal data or information at our site or otherwise through any other medium, you can be assured that such information stays with us and is divulged only in accordance with the applicable laws and to the authorised persons, agencies only. Tata Teleservices will not give or sell any information collected on the website to any data-collecting agencies or external companies for marketing or solicitation purposes.

At [tatateleservices.com](http://tatateleservices.com) and [tatatelebusiness.com](http://tatatelebusiness.com), we want to meet your specific needs by fostering an interactive and personalized environment. Thus, we may ask for your other particulars and opinions so that we can continuously improve our relationship with you. To assure you of our commitment to privacy, we have adopted the following standards while delivering services to you.

## **Tata Teleservices and your Privacy:**

This policy shall apply to all the legal entities comprising of Tata Teleservices Limited and its subsidiary companies namely Tata Teleservices (Maharashtra) Limited, Tata Tele NXTGEN Solutions Limited, TTL Mobile Private Limited & NVS Technologies Limited and shall include such subsidiary company/s that may come into existence in future, each of which may process your personal data basis your relationship with respective subsidiaries. References to “we”, “our” or “us” in this Policy refer to the relevant company, that is responsible for processing your personal data, as indicated in any contract for products or services you may avail from us.

Additional information on our personal data practices may be provided in contractual agreements, supplemental privacy statements, or notices provided to you prior to or at the time of collection of your personal data. For the purposes of this Policy, any reference to “Services” is a reference to all the products and services offered by Tata Teleservices and its subsidiaries, whether available online or offline, and any reference to “Sites” is a reference to any of the Tata Teleservices websites (including any mobile version of such websites), whether operated under the banner of Tata Teleservices or a brand name that we own.

Our use of your personal data is governed by this Policy as it may be updated from time-to-time. The most up to date version of the Policy will always be available at [tatateleservices.com](http://tatateleservices.com) and [tatatelebusiness.com](http://tatatelebusiness.com). Your use of our Sites or Services, and any dispute over privacy, is subject to this Policy and our Terms of Use (which are incorporated by reference into this Policy) and any written contract for Services between you and us or any person who provides you with access to our Services. Depending upon your interactions with us, other terms may also be applicable to you and our use of your personal data.

## **Sensitive Personal Data or Information (also referred to as ‘Personal Information’):**

Tata Teleservices shall not collect sensitive personal data or information unless —

- (a) the information is collected for a lawful purpose connected with a function or activity of Tata Teleservices or any person on its behalf; and
- (b) the collection of the sensitive personal data or information is considered necessary for that purpose.

Following shall inter-alia constitute ‘Personal Information’:-

- Your identity, demographics and any other information shared by you including but not limited to your name, address, gender, date of birth, occupation, proof of identity, proof of address, contact details, passwords, financial information, physical, physiological and mental health condition, Biometric information; etc.
- Your usage /call data records, including phone numbers, phone location, device details (incl. device OS specific identifiers), phone usage, web usage, purchasing habits, browsing history, website, applications and offline services etc.
- Your communication history in connection with customer support e.g. call recording, email or letter, etc.
- any detail relating provided to Tata Teleservices for providing services and
- any of the information received by Tata Teleservices for processing, stored or processed under lawful contract or otherwise.

## **How We collect Personal Information:**

Tata Teleservices may collect personal information in a number of ways, including:

- Directly from you, when you submit your personal details at [tatateleservices.com](http://tatateleservices.com) or subscribe to our services and execute CAF and/or an Agreement with Tata Teleservices. We collect or receive information from you when you sign up for our services, create an online account with us, make a

purchase, request details or a call back, submit a technical, customer or billing support request, participate in a contest or survey, provide us with feedback or otherwise contact us.

- Billing Information related to your commercial and financial relationship with us, such as the services we provide to you, the telephone numbers you call and text, your payment history and your service history.
- Technical & Usage Information related to the Services we provide to you, including information about how you use our networks, services, products or websites (search history).
- From third parties such as Tata Teleservices's related companies, credit reporting agencies or your representatives; we sometimes collect personal data about you from trusted third parties, in connection with Services that we provide to you or propose to provide to you, where appropriate and to the extent we have a justified basis to do so. These include fraud-prevention agencies, business directories, credit check reference/vetting agencies and connected network providers. Anyone who provides you with access to your Services may also provide us with your personal data in that context.
- From publicly available sources of information;
- From Tata Teleservices's own records of how you make use of our services; or

### **How We use your Personal Information**

Your personal information may be used to:

- Verify your identity;
- Assist you to subscribe to Tata Teleservices's and/or its associate's products and services;
- Provide the services you require;
- Administer and manage those services, including charging, billing and collecting debts;
- Inform you of ways the services provided to you could be improved or of additional products, services or tariff plans that could be subscribed by you;
- To respond to your inquiries, to provide any information that you request, to address technical support tickets, and to provide customer service support;
- Conduct appropriate checks for credit-worthiness and for fraud;
- Research and develop Tata Teleservices's and/or its associates' products and services;
- To administer, monitor, improve and customize our Sites and Services, for our internal operations, including troubleshooting, network management and network optimisation, research and analytical purposes, so that we can provide our customers with a better customer experience;
- Gain an understanding of your information and communication needs in order for Tata Teleservices to provide you with a better service;
- Maintain and develop Tata Teleservices's business systems and infrastructure, including testing and upgrading of these systems. Also, your personal information is collected so that Tata Teleservices can promote and market its or its associates' services to you (including by way of direct mail, telemarketing, SMS and MMS messages). Tata Teleservices does this to keep you informed of its products, services and special offers as also any promotional offers designed by Tata Teleservices in collaboration with third parties. If you do not wish Tata Teleservices to promote and market its products, services, and special offers to you, please visit [uat.tatateleservices.com](http://uat.tatateleservices.com) (Do Not Disturb)
- To defend any demands, claims and litigations or proceedings arising against Tata Teleservices;
- To investigate, prevent or take action regarding illegal activities, fraud, threats to our property or personnel and violations of our Terms of Use and/or applicable law and also to meet our legal and regulatory obligations;
- Carry out any activity in connection with a legal, governmental or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution &
- Transfer to any other body corporate or a person in India, or located in any other country, that ensures the same level of data protection that is adhered to by Tata Teleservices, provided such transfer of personal information is necessary for the performance of the lawful contract between Tata Teleservices or any person on its behalf and such other body corporate or person in India, or located in any other country.

### **Where do We disclose your Personal Information:**

- In order to deliver the services, you require, Tata Teleservices may disclose your personal information, to the extent required only, to the below illustrative agencies/organizations outside of Tata Teleservices. Your personal information is disclosed to these agencies/organizations only in relation to the services being provided to you and/or in connection with improvisation of services through innovations: Affiliates;
- Sales and Marketing;
- Business associates/business partners/ channel partners/ agents, who are contractually associated with us for providing service to us or to our customers, either directly or indirectly;
- Third Party Service Providers;
- Customer enquiries;
- Mailing operations;
- Billing and debt-recovery functions;
- Information technology services;
- Installation, maintenance and repair services;
- Market research;
- Web site usage analysis. Tata Teleservices takes reasonable steps to ensure that these organizations are bound by confidentiality and privacy obligations in relation to the protection of your personal information;
- Business Transfers. If we are acquired by or merge with another company, or if substantially all of our assets are transferred to another company (which may occur as part of merger, demerger, assignment, sale of business and/or on account of liquidation proceedings), we may transfer your personal data to such other company/s. We may also need to disclose your personal data before any such acquisition or merger, for example to our advisers and any prospective purchaser's advisers &
- Sharing Aggregated and De-Identified Information. We may use your personal data to create aggregated and anonymised information which we may share with third parties. Nobody can identify you from that anonymised information. In other circumstances we may pseudonymise your personal data before sharing it with a third party so that we can re-associate you with the information once it has been processed and returned to us. Whilst the third party will not be able to identify you from the pseudonymised information, we will still be able to. We treat pseudonymised data as though it were personal data and ensure the same level of protection for it when sharing with third parties.

### **In addition, Tata Teleservices may disclose your personal information to:**

- You or Your authorized representatives or your legal advisers (e.g. when requested by you to do so);
- Credit-reporting and fraud-checking agencies;
- Credit providers (for credit related purposes such as credit-worthiness, credit rating, credit provision and financing);
- Tata Group Companies and /or Sister Companies of Tata Teleservices;
- Tata Teleservices's professional advisers, including its accountants, auditors and lawyers;
- Government and regulatory authorities, agencies and other organizations, as required or authorized by law; and
- Organizations who manage Tata Teleservices's business and corporate strategies, including those involved in a transfer/sale of all or part of its assets or business (including accounts and trade receivables) and those involved in managing Tata Teleservices's corporate risk and funding functions (e.g. securitization). In certain situations, Tata Teleservices may be required to disclose personal data in response to lawful requests by public authorities, including Security Agencies to meet national security requirements as well as instances requiring co-operation with law enforcement agencies.

### **Storage and Retention:**

Your information or data will primarily be stored in electronic form. However, certain data can also be stored in physical form.

Your information will remain with us during your active association on account of subscription to our services and/or on account of business association with us in whatsoever form, direct and indirect. Post your disassociation, the information will be retained by us for a minimum period of 180 days or such longer period as may be mandated in accordance with law and/or under specific instructions from any Court, Government and Statutory Authorities.

### **Confidentiality of Personal Information:**

We have procedures that limit employee access to your personal information to those employees only who need to have access to the personal information. We also educate our employees about the importance of confidentiality and customer privacy through standard operating procedures, training programs, and internal policies.

All our employees are obligated to protect confidentiality and ensure security as per Tata Code of Conduct. Our third-party contractors are bound by contractual obligations to adopt and maintain reasonable level of security practices and procedures to ensure security of information received from us in the course of operations.

To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, we have put in place physical, electronic, and managerial procedures to safeguard and secure the personal data we collect through our Sites and in the provision of our Services. We have put in place reasonable controls (including physical, technological and administrative measures) designed to help safeguard the personal data that we collect via the sites. No security measures are perfect, however, and so we cannot assure you that personal data that we collect will never be accessed or used in an unauthorised way, which may happen due to circumstances beyond our reasonable control. We have put in place procedures to deal with a suspected personal data breach, and we shall notify you and any applicable regulator of a breach where we are legally required to do so. If you have a username and password to access our services, you should take steps to protect against unauthorized access to your password, phone and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen or compromised passwords, or for any activity on your account via unauthorized password activity or other security breach caused by you.

### **Protecting your information exchanged online:**

When you apply online for our service, or provide information to us at our website, you provide personal and financial information that is necessary for us to process your application or payments. Information provided to us at our website is sent in a "secure session" established with Secure Sockets Layer (SSL) technology. SSL protects information that is sent over the Internet between your computer and us by encrypting it and thus prevents misuse.

### **Limitation of Liability:**

You will appreciate and agree that no data transmission over the Internet is completely secure and for reasons outside of our control, security risks may still arise. Tata Teleservices cannot protect any information that you make available to the general public in any publicly accessible area of our website or any other media. Tata Teleservices shall not be responsible for any breach of security, or the disclosure of Personal Information unless Tata Teleservices has been proven to be grossly and wilfully negligent.

### **Access, Correction and Deletion:**

Tata Teleservices takes all reasonable precautions to ensure that the personal information it collects, uses and discloses is accurate, complete and up to date. However, the accuracy of the information depends to a large extent on the information that you provide. That's why Tata Teleservices recommends that you:

- Let Tata Teleservices know if there are any errors in your personal information; and
- Keep Tata Teleservices up to date with changes to your personal information such as your name or address. Tata Teleservices reserves the right to charge a fee for searching for and providing access to your information.

You may write to Tata Teleservices in connection with deleting or amending your information maintained and retained with Tata Teleservices, by sending an email to the appointed Grievance Officer at designated ID viz. '[Grievance@tatatel.co.in](mailto:Grievance@tatatel.co.in)' (*Refer Terms of Use for further details*). However, you will also agree that certain data or information cannot be corrected or deleted or is prohibited to be deleted as required under any applicable law, law enforcement requests or under any judicial proceedings and thus, shall continue to be maintained by Tata Teleservices, as per mandates.

### **Changes to this Policy:**

We regularly review and may make changes to this Policy from time-to-time. To ensure that you are always aware of how we use your personal data we will update the online version of this Policy from time-to-time to reflect any changes to our use of your personal data. We may also make changes to comply with developments in applicable law or regulatory requirements. Where it is practicable, we will notify you by other means prior to changes materially affecting you such as by posting a notice on our Sites or sending you a notification. However, we encourage you to review this Policy periodically to be informed of any changes to how we use your personal data. This Policy was last amended on 09<sup>th</sup> Oct 2018.

### **Disclaimer:**

Terms of this privacy policy are subject to the Tata Teleservices 'Terms of Use' of the Site which are hereby incorporated impliedly and are deemed to have been read, understood and unconditionally accepted by you.

We believe that there are various factors due to which the compliance of the above Policy may go out of our control, including factors of force majeure and in such situations, we shall not be held responsible

Tata Teleservices assumes no responsibility for the content or privacy practices of any other web site, company or organization, including web sites that may be accessed through any link from this Website.

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