

## 1. PURPOSE AND SCOPE

The purpose of this policy is to demonstrate our commitment towards the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information), Rules, 2011 (“Rules”) and towards Nissan-Renault policies for data privacy and protection. This Policy is formulated in Compliance with the Rules as may be applicable to the Company. Hence, the interpretation of definitions and procedures shall be duly in line with the Rules and its amendment from time to time.

Nissan Renault Financial Services India Private Limited (hereinafter “NRFSI”/ “the Company”) is committed to protecting any personal information that we may receive from our Customers/ Vendors/ Employees/ any third parties (hereinafter commonly and interchangeably “Providers”/ “Customers”). It is critical for Providers to know how the Company treat information that the Company may receive when the Providers engage with the Company.

This policy applies to NRFSI, its officers, directors, employees, contract employees, other individuals employed, and Third parties engaged to process Personal /sensitive Personal information by Nissan or Renault Group (“Employees”) and its Stakeholders.

## 2. POLICY

### A. Purpose & Usage:

- a. Provider’s Personal Information/ Sensitive Personal Data is collected and used /processed for lawful, legitimate, contractual, and administrative purposes of the Company.
- b. Generally the Personal Information/Sensitive Personal Data collected pertains to the Provider that may be used for the purposes such as administration and facilitation of relationship with customers, employees, Vendors etc. for internal operational purposes, for marketing surveys and customer research and feedback, to update with information about the Company and the products and services of the Company or its affiliates, to provide information about special offers, from time to time and to satisfy any contractual, legal and regulatory obligations.
- c. The Personal Information/Sensitive Personal Data collected pertaining to the employee may be used for human resource management, technology support/updates, management planning, administration and management of the internal processes, services, and operations to enable it to perform NRFSI’s proper functions and to satisfy any contractual, legal and regulatory obligation.
- d. The Personal Information/Sensitive Personal Data (as per Rules) can be collected /or retained either directly by the Company or through an affiliate or third party.

## NISSAN RENAULT FINANCIAL SERVICES INDIA PRIVATE LIMITED

### **B. Collection of Information**

#### **a. The Company receives the following information from the provider:**

(i) information that is directly provided to the Company, such as personal information provided when the Provider shared directly, or the Provider visit the Company brand's dealer place or Systems or Application; and

(ii) Basic Information regarding the Relevant Individuals such as name, contact details, address, email address, gender, birth date, marital status, children, parents details, dependent details, photos, photo id proof, pan card, passport, voter ID, Aadhar Number, life insurance nominees/beneficiaries, Biometric information to the extent permitted by Law, emergency contact details, citizenship, visa, work permit details, information collected to ascertain Financial status of the Provider; information and access permission pertaining to the Products and Services;

(iii) information that is passively or automatically collected from the Provider, such as information collected from the browser or device the Provider used to access the Company's Website or Services.

#### **b. Information Provided to the Company:**

The Company may need to collect personal information from the Provider/Customer for a specific purpose. For e.g., Customer register forms, application for services and products, seek out enabler connects. During these various offerings, the Company often seek to collect from Provider/Customer various forms of information, such as: name, address, e-mail address, telephone number, fax number and business details. At some instances, customer may also be able to submit Information about their business plan.

#### **c. Information That is Automatically Collected:**

In general, the Company customer can visit the Company's dealer place or Systems without the knowledge of the Company and may reveal any information about themselves. The Company and Our third-party service providers or other partners (collectively 'Partners') may use automated means to collect various types of Information about customer and their computer or other device used to access our systems. A representative, non-exhaustive list of the types of automatically collected information may include: network or Internet protocol address and type of browser the Provider are using (e.g., Chrome, Safari, Firefox, Internet Explorer), the type of operating system the Provider using, (e.g., Microsoft Windows or Mac OS), mobile network, device identifiers, device settings, browser settings, the web pages of the Website the provider have visited, Website visited before and after the Provider visited the Company Website, the type of handheld or mobile device used to view the Website (e.g., iOS, Android), location information, and the content and advertisements Provider have accessed, seen, forwarded and/or clicked

## NISSAN RENAULT FINANCIAL SERVICES INDIA PRIVATE LIMITED

on. NRFSI does not collect anonymous information through cookies and log files to contact the customer or personal who visits NRFSI webpage.

### **C. How the Company may Use the Providers Information**

#### **a. Consent to data processing:**

By visiting the Company's authorized dealer places or using the Company's Systems/Applications, the Provider/Customers accept that the Company may retain their Information and that it may be held by the Company or any of its partners that processes it on our behalf. The Company, along with its Partners, shall be entitled to use the Providers Information for the following purposes:

- i. Provide and communicate with provider/customer about feedback, follow up on products you've applied for, or queries submitted to the team
- ii. Fulfil provider/customer requests regarding the services, including without limitation to respond to your inquiries, communicate with the Provider/Customer about the Company's products or services to render benefits to the Provider/Customer.
- iii. Enforce the legal terms (including without limitation to the Company's policies and terms of service) that govern the Customer use of our Services, and/or for the purposes for which the Customer provided the Information.
- iv. Provide technical support for the Website or in connection with the Company's services and Offerings,
- v. Identify fraud or potentially illegal activities (including, without limitation to, vehicle theft or copyright infringement) on or through the Company's Website or Services,
- vi. Protect the safety of its Stakeholders,
- vii. Perform analysis regarding how the Customer use the Services or any part thereof such market research, including statistical analysis of User behavior which the Company may disclose to third parties in depersonalized, aggregated form.
- viii. to enable the Company to comply with any requirements imposed on the Company by law.
- ix. to send Provider/Customer periodic communications (this may include e-mail), about features, products and services, events, and special offers. Such communications from the Company may

## NISSAN RENAULT FINANCIAL SERVICES INDIA PRIVATE LIMITED

include promotion of programs being organized by third parties beneficial to the Provider/Customer.

### **D. Security and Storage:**

The Company is committed to collecting personal data **only as needed for legitimate business purposes**, and to **retaining personal data no longer as the Company consider necessary for such purposes**.

NRFSI undertakes several security measures to maintain the safety of the Provider's personal information, which includes the use of physical secure data centers and premises; internal security policies and procedures; defined internal segregation of duties; and electronic access controls such as passwords and encryption technology. The Company follows industry acceptable standards to collect, store and protect personal data, including the use of encryption. The Company retain personal data for as long as it is needed to provide the services the Customer /Provider have requested, and thereafter for legal and service purposes. These may include retention periods mandated by legal, contractual, or similar obligations; for resolving, preserving, enforcing, or defending our legal and contractual rights; needed to maintain adequate and accurate business and financial records or how the Provider access, update, or delete the data etc.

### **E. Information Sharing and Disclosure**

The Personal Information/Sensitive Personal Data collected would only be used, processed and/or shared within the affiliates and/or group companies, authorized by NRFSI. NRFSI would not disclose any Personal Information/Sensitive Personal Data to any external organization unless it has the consent of the provider or are required by law or have previously informed the Provider.

Customer/Provider's privacy is a key consideration in all technology solutions, whether they are developed for the Company or its brand entities Products and Services or used by the Company Stakeholders. NRFSI is committed to taking reasonable steps to ensure that any party or parties who receive personal data from NRFSI or NRFSI's stakeholders, or provide services to NRFSI's customers, in connection with our Products and Services adhere to the Privacy Principles.

### **F. No Obligation**

The Customer/ Provider is under no obligation to provide any personal information requested by NRFSI and a Provider can withhold any personal information as he/she may choose, but in such a case NRFSI may not be able to provide all products and services as this will depend on the kind of information withheld.

## NISSAN RENAULT FINANCIAL SERVICES INDIA PRIVATE LIMITED

The Provider can withdraw or take back any specific consent provided earlier at any time by writing to the Company or opt out by unsubscribing online forms subscribed earlier. A minimum period of ten business days is required to process the requests. The Provider may review the Personal Information/Sensitive Personal Data provided to the Company for the purpose of ensuring that the said information is accurate. The Company shall not be responsible for the authenticity of the information supplied to the Company or to any person acting on behalf of the Company.

### **G. Transfer of information**

The Company or any person on its behalf may transfer sensitive personal data or information including any information, 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 the Company as provided for under these Rules. The transfer may be allowed only if it is necessary for the performance of the lawful contract between the Company or any person on its behalf and provider of information or where such person has consented to data transfer.

### **H. Contact Us**

The Company strives to maintain the Provider's personal information on the records as accurately and updated as reasonably as possible. On request, the details on record, the purpose for which it is used, and to whom has it been disclosed can be provided. Access to personal information in the possession of the Company shall be subject to certain exceptions and reasonable costs. If the personal information that the Company hold about the Provider is incorrect or changed then the Provider can notify the Company of such changes. Additionally, any discrepancy or grievance of the Provider of information about processing of information can be addressed to the following contact (Grievance Officer) at [gro.nrfsi@nrfsi.com](mailto:gro.nrfsi@nrfsi.com) or Head – Compliance at [Vivekanandan.babu@nrfsi.com](mailto:Vivekanandan.babu@nrfsi.com)

## **3. DEFINITIONS**

**“Personal Information”** means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

**“Sensitive Personal Data of a person”** means such Personal Data which consists of information relating to Password, Financial Information such as bank account or credit card or debit card or other payment instrument details, Physical, physiological and mental health condition, Sexual orientation, Medical records and history, Biometric Information, Internet Protocol(IP) address, Geo- positioning/Location data, any other details relating to the above mentioned, provided by any person to the Company for providing services and any Information received pursuant to the above mentioned by NRFSI for processing or storing such Information under a lawful

## NISSAN RENAULT FINANCIAL SERVICES INDIA PRIVATE LIMITED

contract or otherwise. Provided that any Information that is freely available or accessible in public domain or furnished under the Right to Information Act 2005 or any other law for the time being in force will not be considered as Sensitive Personal Data.

**“Employees”** are identified or identifiable persons, who are employed including Contract employees by NRFSI or its Partners or affiliates.

**“Customers”** are identified or identifiable natural persons, who show NRFSI that they have an obvious interest in concluding a contract for the purpose of acquiring a product or a service or that they are the recipient of a product or service provided by the Company or its Group entities.

**“Provider”** are customers/employees/Vendors or individuals who provide the personnel and sensitive information to the Company.

**“Processing”** is any operation or set of connected operations performed using the Personal Data, whether with or without the help of automatic means. This includes collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

**“Stakeholders”** refers externally to customers who use NRFSI or Nissan/Renault products and services, and dealers, business partners and suppliers who partner in the development and delivery of the same. Internally, “Stakeholders” refers to individuals acting on behalf of NRFSI who are involved in the collection, use, retention, protection and management of personal data, and all persons involved in the development of NRFSI or Nissan/Renault products and services. This includes not only NRFSI or Nissan/Renault -related company employees, but also people including loaned workers transferred temporarily; temporary employees (including contractors and consultants); employees of outside companies who work at a NRFSI or Nissan/Renault office regularly; and interns and trainees.

**“Products and Services”** refers to NRFSI financing products including insurance products or services of any nature and Nissan/Renault-produced vehicles under any brand, vehicle electrical systems, theft-deterrent systems, connected telematics and infotainment systems, advanced driver assistance systems, and systems that interact between the vehicle and its surroundings, and all related services.

**“Group or Brand entities”** means Nisan or Renault brand entities and its associate or subsidiaries.