

Veolia India-Data Privacy Policy

January 01, 2021

To

Veolia India PVT. LTD and Its Affiliates

FROM

Guillaume Dourdin - MD & CEO Veolia India

Sanjeev Ludhani - Data Protection Manager

Privacy Policy

Veolia India Private Limited

*Veolia strongly believes that the respect of privacy and the protection of personal data are a cause of great concern and a way to create trust. This privacy policy ("**Policy**") will help you understand what information we collect at Veolia, why we collect it, how Veolia uses it, including if and how we share the information with third parties, and the choices you have.*

We base the decision to collect, use or share personal data on your interest in order to process only necessary, relevant, adequate, proportionate, accurate, timely and secure data for a period of time in conformance with the purposes of the processing.

This Policy is intended to inform individuals i.e. employees, candidates, website users/ clients/ customers, service providers, partners and their employees ("you" or "your"), the manner in which **Veolia India Private Limited**, with its registered office at, A-15, 4th Floor, Pratap Nagar, Mayur Vihar Phase I, East Delhi, Delhi-110091 ("**Veolia**", "**we**", or "**us**"), collects information from you, processes your information, how we use and disclose/ transfer such information, and the steps we take to protect such information. This Policy is applicable to and shall be adopted by all Indian affiliates of Veolia, as more particularly listed in Annexure I ("**Veolia India Affiliates**").

1. INFORMATION COLLECTED

In connection with your relationship with Veolia, we may have, or will collect or assemble information about you and your relationship with Veolia. Please note that data/ information may be collected when you visit our website at www.veolia.in ("**Website**"). The data or information collected by Veolia may contain 'sensitive personal data or information' ("**SPI**") or 'personal information' as defined under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or

Information) Rules, 2011 ("**Data Protection Rules**").

The data we collect may include the following types of data, but is not restricted to:

- a. Employee/ contractor personal details: Name, employee identification number, work and home contact details (email, phone numbers, physical address), language(s) spoken, gender, date of birth, Voter ID, passport number, Aadhaar number, PAN Card, marital/civil partnership status, domestic partners, dependents, emergency contact information and photograph;
- b. Other employee-related information: Wages and salaries, career management, health protection, position and contractual information, system and application access data, provision of professional equipment and tools;
- c. Audiovisual materials: Photograph, and images/footage captured on CCTV or other video systems, voice recordings;
- d. Performance-related information: Letters of application, resume/CV or other provided documents, details on performance decisions and outcomes, performance and development reviews and information used to populate employee biographies;
- e. Data collected automatically while using the Website: Cookies, browser web storage (e.g., HTML5), web beacons and similar technologies;
- f. Contractual relation with clients: Services and goods provided, billing information; and
- g. Contractual relation with providers: Management of contracts, billing information.

In addition to the above, we may also collect any data/ information relating to the following which constitutes SPI as per the Data Protection Rules:

- a. password;
- b. financial information such as bank account details or credit card or debit card or other payment instrument details;
- c. physical, physiological and mental health condition;
- d. sexual orientation;
- e. medical records and history;
- f. biometric information; and
- g. any detail relating to the above as provided to Veolia for providing any services.

It is clarified that, prior to collecting such data/ information, Veolia India or Veolia India Affiliates (as the case may be), will need to obtain your written consent and such SPI will be handled or dealt with strictly in accordance with paragraph 4(b) of this Policy and the Data Protection Rules.

We limit the data collected to what is strictly necessary to complete the purpose of the processing as provided in paragraph 2 below and agree to:

- erase all irrelevant data,
- restrain from retaining data for an unlimited duration, and
- abstain from processing SPI, except as provided in accordance with this Policy.

2. HOW WE USE THE INFORMATION WE COLLECT

We will use your information for the following purposes:

- Managing our contractual and/or employment relationship with you;
- Facilitating communication with you (including in case of emergencies);
- Operating and managing our business operations/ providing services;
- Complying with legal requirements;
- Monitoring your use of our systems;
- Undertaking data analytics; and
- Social listening (identifying and assessing what is being said about us and our clients on social media).

It is clarified the information so collected from you shall only be used for the purpose for which it is being collected for, which purpose (including details of the recipient of such information) shall be disclosed to you at the time of collecting the information.

3. RÉTENTION

The information above would be collected, used and retained by Veolia or any Veolia India Affiliates (as the case maybe).

We will not retain any SPI for longer than is required for the purpose for which such data or information was collected or may lawfully be used or is otherwise required under any other law for the time being in force.

4. DISCLOSURE AND/ OR TRANSFER

All data/ information that we collect is disclosed or transferred only under the following circumstances, to the entities/individuals identified below:

a. Disclosures/ Transfer to Veolia personnel or within Veolia Group

Access to your personal data within Veolia will be limited to those employees who have a need

to know the information for the purposes described in this Policy, which may include your managers and their designees, as well as personnel in Security, Technical, Human Resources, Information Technology, Compliance, Legal, Finance and Accounting. All employees within Veolia will generally have access to your business contact information (e.g. name, position, telephone number and e-mail address).

Due to the global nature of Veolia's operations, we may disclose information to personnel and departments throughout Veolia Group to fulfill the purposes described in this Policy. This may include transferring information to other countries (including countries other than where you are based that have a different data protection regime than is found in the country where you are based). However, we will ensure that the information is protected in the same manner as Veolia protects your information and that the same standards of data protection are implemented. Veolia India will remain responsible for any information collected from you that is transferred to or used by Veolia Group (including for avoidance of doubt any Veolia India Affiliates).

b. Disclosures or transfers to third parties

Except as described in this Policy, we will not disclose or transfer information about you (including SPI) that we collect, to third parties without your consent. We may disclose or transfer information to third parties if you consent to us doing so, as well as if such disclosure or transfer is necessary for performance of a contract between Veolia (or any entity on its behalf) and you. Further, in case of SPI, we will not disclose any SPI except with your prior consent, unless such disclosure is agreed under the contract between Veolia (or any entity on its behalf) and you or where such disclosure is necessary for compliance of any legal obligation.

Generally, we limit the information provided to these service providers to that which is strictly necessary to reach the purposes of the processing and to allow them to render the expected services.

We will refrain from sharing personal data where not made mandatory by law or to reach the purposes of the processing and to the extent possible, will adapt our contracts to secure shared data. In all our contracts, we will have provisions to ensure the protection of personal data and prevent inappropriate use.

SPI shall be transferred only to a third party that ensures the same level of data protection that Veolia has adopted, as provided for under the Data Protection Rules.

c. Mandatory Disclosures or Transfers:

We may disclose data or information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a court order, judicial or other government warrant, or to otherwise cooperate with law enforcement or other governmental agencies.

5. YOUR CHOICES

You may, of course, decline to share certain information with us (including any SPI). However, if you do not provide certain information, we may not be able to fulfil our obligations towards you. If you wish to access, review, amend or delete any other personal information we hold about you, you may contact us at DPM.India@veolia.com

If you are a website user, then your use of our website will be subject to our legal notice and cookie policy available at - www.veolia.in

6. DATA SECURITY

We make sure that the security measures are proportionate to the risks involved and are taken to preserve the availability, the confidentiality and the integrity of the processing. We ensure the confidentiality and security of the SPI by implementing comprehensive information security practices and standards as mandated by the Data Protection Rules.

Please be aware that no security measures are perfect or impenetrable. We cannot and do not guarantee that information about you will not be accessed, viewed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

7. CHANGES AND UPDATES TO THIS POLICY

We may revise the Policy from time to time. Please revisit this page periodically to stay aware of any changes to this Policy. If we modify this Policy, we will make it available through our website / internal employee portal (as applicable) and indicate the date of the latest revision.

We may not be able to separately notify you of the revisions each time that we make them. We encourage you to check the Website / internal employee portal (as applicable) periodically for modifications or revisions to the Policy to understand how it affects the use of your information. We will not be responsible for your failure to remain informed about such changes.

8. DATA PROTECTION MANAGER

Please contact us with any questions or comments about this Policy, information we have collected or otherwise obtained about you, our use and disclosure practices, or your consent choices. You may address any such questions or concerns to our Data Protection Manager whose name and contact details are as follows:

Name: Mr. Sanjeev Ludhani

Designation: Data Protection Manager

Email: DPM.India@veolia.com

Annexure - I

List of Veolia India Affiliates

Orange City Hydraulic Works Private Limited

Orange City Water Private Limited

Nangloi Water Services Private Limited

C.E.S. Onyx Private Limited

Detox India Private Limited

Safe Enviro Private Limited