

UPL Corporate Privacy Policy

Version 1.0

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Document Control

Change Control

Version	Revision Date	Nature of Change
0.9	1-05-2018	Policy Creation
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Document Change Reviewers

- UPL IT and Legal Jointly

Document Change Approvers

- UPL IT and Legal Jointly

Major changes require the approval of the above personnel. Minor changes require the approval of the Document Change Reviewers only. Minor changes are those that affect cosmetic needs and clarifications, but not the overall structure/scope of the process.

Document Review Plan

This document will be reviewed at least annually or whenever necessary, as required to correct or enhance the information or content.

Contact Information

For further information on this UPL Privacy Policy ("Policy"), contact the local UPL representative at UPgmbH@uniphos.com.

Document Distribution

Printed copies are for reference only and are not controlled. It is the responsibility of users of this document to ensure they are using the most recent version.

Privacy Policy

1. Introduction

We want you to be familiar with how we collect, use and disclose information. This Privacy Policy describes the privacy practices of UPL Limited, its group companies, subsidiaries, assigns and affiliates (“UPL”) in connection with the information that we collect through www.uplonline.com and its sub domains (“www.uplonline.com”) operated by us from which you are accessing this Privacy Policy. We want our services to be safe and secure for our users. Uniform practices for collecting, using, disclosing, storing, retaining, disposing, accessing, transferring or otherwise processing such information assists UPL to process Personal Information fairly and appropriately, disclosing it and/or transferring it only under appropriate circumstances. This privacy policy relates to our use of any personal information we collect from you for providing hospitality related services.

This privacy policy intends to update you how we use your personal information collected through www.uplonline.com or provided by other means. Please read this privacy policy before using www.uplonline.com or submitting any personal information. The privacy policy also relates to our use of any personal information you provide to us by phone, SMS, email, in letters and other correspondence and in person.

This policy will be updated subject to any changes in information collection, activities performed or any applicable regulations. You are encouraged to review the privacy policy whenever you visit www.uplonline.com to make sure that you understand how any personal information you provide will be used.

Please Note:

The privacy practices set forth in this privacy policy are for www.uplonline.com only. If you link to other web sites, please review those privacy policies, which may be very different.

Site

The site makes available information relating to UPL Limited, a corporation constituted under the laws of India, and its subsidiaries, controlled entities, affiliates and related parties ("UPL").

Trade Marks

The Site contains “UPL” trade and service marks and devices (including the word “UPL”) and other valuable trade or service marks owned by UPL or licensed to UPL to distinguish its services and products. These trade and service marks and related intellectual property are protected from copying and simulation under national and international laws and may not be reproduced or copied without the express prior written consent of UPL.

Without limitation, you must not use any of the said trade or service marks:

- in or as the whole or part of your own trade marks;
- in connection with activities, products or services which are not undertaken or provided by UPL;
- in a manner which may be confusing, misleading or deceptive; or
- in a manner that disparages UPL or its information, products or services (including this Site).

Copyright

The information, text, graphics, images, sounds, links and all other information and software published or otherwise contained in the Site (“Information”) are either owned exclusively by UPL or licensed by UPL and except as specifically provided in these Conditions may not be copied, distributed, displayed, reproduced or transmitted, in any form or by any means whether electronic, mechanical, photocopying,

recording, or otherwise, without the prior written approval of UPL. Without limitation you may not, without such approval from UPL, create derivative works from any part of the Site or commercialize any Information, products or services obtained from any part of the Site. Information procured from a third party may be the subject of copyright owned by that third party.

2. Purpose

The purpose of this policy is to highlight various obligations, best practices and tools that support in compliance with data privacy regulations applicable to UPL in its role as both data controller as well as data processor.

3. Applicability

This privacy policy is applicable to everyone who accesses and uses www.uplonline.com including but not limited to UPL customers, operating units, third party service providers, wholly owned subsidiaries worldwide and visitors who use this website.

4. Collection and use of information

4.1 Collection of your information

UPL collects, processes, and retains information about you when you visit our website www.uplonline.com. You may choose to provide us with information, such as your name, email address, company information, street address, telephone number, other contact and demographic information when you sign up for our newsletters, register on our sites, buy a product from us, fill out a survey, make a comment or enquiry, post something on our social media pages, etc,

Moreover, you may choose to provide your personal information in connection with sending an e-mail or message, logging complaints, and when you use our service.

Personal Information may include, but is not limited to:

- i. Your name and physical address, email addresses, and telephone numbers
- ii. Behavioral or demographic attributes, when tied to personal identifiers
- iii. Credit card or debit card number

4.2 How we use your information

Any of the information we collect from you may be used in one of the following ways:

- i. **To develop, customize and improve the services:** We shall process your personal information, preferences, user characteristics and usage patterns, and feedback to develop, customize and improve the services.

If you refuse consent for processing your personal information for the mentioned purposes, in this subsection, you will not be significantly hindered in your use of the service. Refusing or withdrawing consent thus has no significant negative effects on your use of the service.

- ii. **Marketing purposes to inform you about other information, events, promotions, products or services** we think will be of interest to you.
- iii. **To process personal information necessary for the performance of a contract and providing the services:** We may use this information for the provision of the website and the provision of the

service according to our [Terms of Service](#). Further, to process and/or respond to your requests, submissions, queries, complaints and any transactions and to provide you with information or services requested.

If you object to processing of your personal information for the mentioned purposes, in this subsection, we may block or limit your access to the service and we reserve the right to end the agreement in accordance with the Agreement and/or the Terms of Use.

- iv. **To process your personal information necessary for compliance with a legal obligation:** In order to prevent or investigate actual or suspected fraud, hacking, infringement, or other misconduct involving our services or website. Additionally, if we are required by law to disclose your information to any government authority, you consent to the provision of such information.
- v. **To send periodic emails:** The email address you provide will be used to send you information and updates pertaining to UPL.
- vi. **Select Content, Improve Quality and Facilitate Use of the other interface channels :** UPL may use your Personal Information to help create and personalize content on our Channels, facilitate your use of the Channels (for example, to facilitate navigation and the login process), avoid duplicate data entry, enhance security, improve quality, track campaign and survey responsiveness and evaluate page response rates.
- vii. **Obtain Third Party Services:** We also share Personal Information and Other Information with third parties who provide services to UPL website management, information technology and related infrastructure provision, marketing and campaign, customer service, e-mail delivery, auditing, and other similar services. When UPL shares Personal Information with third party service providers, we would try to ensure that they use your Personal Information and Other Information only for the purpose of providing services to us and subject to terms consistent with this Policy.

5. Fairness and Purpose

UPL will collect adequate, relevant and necessary Personal Information, and will process such information fairly and lawfully for the purpose it is collected. The purpose of collection will be specified not later than at the time of data collection, or on each occasion of change of purpose.

6. Accuracy of information

The information held by UPL on www.uplonline.com or in our other systems shall be checked and from time to time we may change the information requested upon registration or with respect to certain features or service.

7. Distribution of Information

7.1 Information Disclosure

UPL does not share, sell, rent, or trade personal information collected through www.uplonline.com or availed during any of the other services provided by UPL, with third parties for their sole promotional purposes or as otherwise outlined in this Privacy Policy. UPL may share information with third party service providers contracted to provide services on our behalf for processing personal information, to conduct marketing campaigns and related services. These third party service providers may only use information we provide to them as requested and instructed by UPL.

- i. UPL may disclose your Personal Information as we believe to be necessary or appropriate:
 - a) under applicable law, including laws outside your country of residence;

- b) to comply with legal process;
 - c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes;
 - d) to enforce our terms and conditions; and
 - e) to allow us to pursue available remedies or limit the damages that we may sustain.
- ii. Additionally, in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), we may transfer the Personal Information we have collected to the relevant third party.
- iii. We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when:
- a) permitted or required by law; or,
 - b) trying to protect against or prevent actual or potential fraud or unauthorized transactions; or,
 - c) investigating fraud which has already taken place. The information is not provided to these companies for marketing purposes.

If UPL goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personal information collected through our website(s) may be among the assets transferred. A prominent notice will appear on our website(s) for 30 days after any such change in ownership or control of your personal information.

7.2 Data Transfers

UPL is a global organization and provides a global service. Sharing information cross border is essential to the Services so that you receive the same high quality service wherever you are in the world. As a result, we may, subject to applicable law, transfer Personal and Other Information collected in connection with the Services, to these entities in countries where information protection standards may differ from those in the country where you reside. By making a reservation, staying at a UPL property or using any UPL-branded service, you understand that we may transfer your personal information globally.

In most cases, the information you provide is added to a UPL local or global database. In the course of processing your information, it may be necessary to transfer your personal data to UPL's affiliates, and/or third party service providers located in India and throughout the world for the purposes outlined within this Privacy Statement.

8. Consent and Control

8.1 Consent

Consent is often referred to as an individual's choice to "opt-in" or "opt-out" of UPL's use of personal information and is usually obtained by a "check box" or signature confirming the individual understands and agrees to the processing of their personal information. At times, express written consent from the individual may be required based on the information processing activity. UPL receives consent from individuals prior to:

- i. collecting, using, or processing their personal information, including sensitive personal information, in certain ways or sharing the individual's personal information with any third party. Sensitive personal data is data revealing an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation;

- ii. transferring the individual's personal information outside of the individual's country of residence
- iii. using or placing web cookies on an individual's computer or other electronic devices.

8.2 Control of your information

UPL also provides individuals with the right to control their personal information, which includes the right to access, modify, erase, restrict, transmit, or object to certain uses of their information.

You may request to review, correct, update, suppress or object to the use or processing of your Personal Information that you have previously provided to us through www.uplonline.com or when availing any of the other services provided by UPL. You may review, update, correct or delete your Personal Information collected through the website or service by e-mailing us at UPgmbH@uniphos.com.

If you have privacy concerns regarding access to or the correction of your Personal Information, please contact us at privacy contact information mentioned within Section 12 "Privacy Contact Information" of this policy.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information that you have provided to us.

While the majority of questions and issues related to access or requests can be handled quickly, complex requests may take more research and time. In such cases, issues will be addressed, or you will be contacted regarding the nature of the problem and appropriate next steps, within 30 days.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such purchase, reservation, or promotion). There may also be residual information that will remain within our databases and other records, which will not be removed. In addition, there may be certain information to which we are unable to enable you to review, for legal, security, or other reasons.

UPL reserves the right to decline access to your Personal Information under certain circumstances. If your Personal Information is not disclosed to you, you will be provided with the reasons for this non-disclosure.

9. Commitment to data security

We strive to keep your personal information secure and take reasonable effort to ensure that appropriate security and technical controls are implemented for ensure the security. Only selected authorized employees, business partners, vendors and other third party providers may have access to this information.

UPL ensures that our third party service providers' employs industry standard security measures to ensure the security of information through legally binding terms and conditions. However, users of our www.uplonline.com are responsible for maintaining the security of any password, user ID, or other form of authentication involved in obtaining access to password protected or secure areas of www.uplonline.com. Access to and use of password protected and/or secure areas of www.uplonline.com is restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution.

Use of cookies

We and our partners use various technologies to collect and store information when you visit www.uplonline.com, and this may include using cookies or similar technologies to identify your browser or device. Cookies are pieces of information stored directly on the computer or mobile device that you are using. Cookies allow us to collect information such as browser type, e-mail address when you are using Google Chrome, time spent on the Online Services, pages visited, referring URL, language preferences, and other aggregated traffic data. We and our service providers use the information for sending e-mailers to our website visitors whose online behaviors indicate that they may be interested in travelling, security purposes, to facilitate navigation, to display information more effectively, to collect statistical information, to personalize your experience while using the Online Services and to recognize your computer in order to assist your use of the online services. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Online Services or to send you advertisements and marketing emails. We may also use cookies or other technologies to track responses to our online advertisements and marketing emails. You can configure your browser to refuse cookies, or to warn you before a cookie is placed. If you disable cookies, some parts of our websites may not function properly or at all.

10. Retention and disposal

Your personal data will be retained in a form which enables UPL to identify the individual for no longer than it is necessary for the purposes for which the data was collected and used. Your personal data may be retained in certain files for a period of time as required by applicable law and following UPL's data retention policies in order to comply with such financial or legal requirements, to properly resolve disputes or to troubleshoot problems. If you wish to cancel your account or request that we no longer use your information to provide you services, contact us via the information above. We will respond to your request to access or delete your information within 30 days.

In addition, some types of information may be stored for an infinite duration due to technical constraints, and will be blocked from further processing for purposes which are not mandatory by law or when a consent is withdrawn. The information that you provide may be stored or transferred in our systems or on the systems provided by our third parties.

11. Withdrawing consent and restriction of processing

You may withdraw consent to personal data processing or you may review, update, correct or delete your personal information collected through the website or service by e-mailing us at UPgmbH@uniphos.com. For users below the age of 16, the consent should be provided by the holder of parental responsibility of the child.

12. Privacy Contact Information

You may at any time, contact our local UPL representative directly with all questions and suggestions concerning data protection by e-mailing at UPgmbH@uniphos.com.