

PRIVACY POLICY

This Privacy Policy explains how we at Bharat Petroleum Corporation Limited (hereinafter referred to as **BPCL**, "**we**," "**us**," or "**our**", including our affiliates and group companies) collect, use, share and process your personal information, that you, as the user, provide to us through your use of our website (<u>https://www.bharatpetroleum.in/</u>) (hereinafter referred to as "**Website**").

1. SERVICES

Through the Website, we provide you with certain information and services ("**Services**") including the following:

- a) We provide you with a customer engagement platform to enable you access various types of information about BPCL, including policies, details of our board of directors, activities undertaken as part of our corporate social responsibility; etc.
- b) We also enable you to access a host of products and services through the Website, including:
 - Apply for new domestic gas / LPG connection;
 - Undertake eKyc for consumers, maintain / update user profile, and manage your relationship with us, including tracking status of LPG usage through unique customer identity number;
 - Locate amenities like BPCL authorised distributor / agency, vehicle service centers, etc.;
 - Submit declaration to forego subsidies;
 - Make payments for LPG refill, etc.;
 - Lodge complaints (including Swachh Bharat complaints) and provide feedback;
 - Download application forms to register as a vendor, retail outlet dealer, lubricant distributer, or become an empaneled LNG supplier; and
 - BPC Tarang (only for BPCL management, clerical staff and workmen).
- c) Our Website also facilitates the use of an integrated messaging platform in the form of a chat bot (like Urja) to assist you in accessing our Services.
- d) We also endeavor to provide you with information pertaining to our value added products and services through the Website, such as:
 - Marketing offers on credit / debit cards, petrocard, as well as benefits such as reward points etc.;
 - Schemes like preferred time delivery, PAHAL-direct benefits transfer for LPG consumer scheme etc.;
 - Proficiency tests for labs in compliance with regulatory requirements and accreditation bodies;
 - Nationwide list of fuel stations, their names, address and fuel prices;
 - List of current opening or vacancies in BPCL;
 - Updates issued by Ministry of Petroleum and Natural Gas, Government of India etc. on industry; and
 - Online journals on innovation, technology, corporate journeys etc.



2. WHAT IS PERSONAL INFORMATION?

Personal information refers to any information that can identify you, directly or indirectly, in combination with other information. Sensitive personal data or information refers to the category of personal information such as passwords, financial information, sexual orientation, biometric, etc. For the purposes of this Privacy Policy, personal information and sensitive personal information are collectively referred to as **'Personal Information**'.

By accessing / using the Website or availing any of the Services or clicking "I accept", you represent that you voluntarily provide us with Personal Information including financial information, and consent to their collection, use and disclosure in accordance with this Privacy Policy. You also represent that you are duly authorised by any third party whose information you may share with us.

3. How is Personal Information Collected?

User/Your information may be collected by us through all or any of following methods:

- a) Self-registration by you as a user on the Website;
- b) Registration by accessing formats / documents / information / portals made available through the Website, for various categories of third parties such as dealerships, vendors, etc.;
- c) Purchase transactions undertaken through the Website;
- d) Your interaction through interactive communication tools such as chat bot; or
- e) Your enrolment under various schemes on the Website.

4. Types of Personal Information Collected

The types of information that will be collected by us includes:

- a) Name and demographic data;
- b) Email ID and mobile number;
- c) Other user specific information such as LPG consumer number, distributor's name, dealers code etc.;
- d) Online identifiers and other technical data (for e.g. transaction logs, device details including its location, browser type and language, operating system used by the device, access times, and information collected through cookies, web beacons and other tracking technologies);
- e) Business / firm-related details, including registration documents (where applicable) as well as information of officials / any other person designated as point of contact;
- f) Feedback about BPCL's products/services;
- g) Chat/interaction history with BPCL (through chat bot, etc.); and
- h) Any other information that may be voluntarily provided to us through use of the Services.



5. PURPOSE OF COLLECTION AND USE OF PERSONAL INFORMATION

All information provided by you to us, including Personal Information, is voluntary. When you provide us with your Personal Information, it is implied that you consent to our collection of the information and usage for the purposes mentioned in this Privacy Policy.

We may use your Personal Information for purposes, which include the following:

- a) Create an account on your behalf to enable you to receive our Services, verify identity, including registration, and creation / updation of profile;
- b) Enable you to obtain dealership or become BPCL's vendor, etc.;
- c) Enable you to correct, rectify or update your / your organization's information;
- d) Process any orders you may place using our Services, deliver its products and services, and enable you to avail Services in an efficient manner;
- e) For users, share your Personal Information across different platforms of BPCL to create a singular profile in order to offer you personalized Services and relevant marketing initiatives;
- f) For vendors / dealers, etc., share your Personal Information across different group entities of BPCL to create a singular profile in order to ensure necessary compliance measures, performance metrics, etc.;
- g) Share limited information with third party strategic partners in order to offer value added services, or to the extent necessary for delivering relevant services (e.g. scheduling service and maintenance, providing emergency assistance);
- h) Enable you to make payments in the easiest and shortest possible way (for example, by preferred mode of payment, through saved card details, auto-debit from saved payment details etc.);
- i) Run data analytics for internal purposes such as deriving customer-specific or anonymous insights on consumer behavior, improve our products and services, develop new solutions, undertake market and product analysis including our diagnostics and treatment protocols, etc.;
- j) Evaluate, develop and improve our existing products and services, and/ or develop new product lines;
- k) Perform quality audits and internal training;
- 1) Address requests, queries and complaints, if any, pertaining to our Services and for enhanced customer services and quick resolution;
- m) Contact you to provide new Services, receive feedback, and assist you with completion of transactions or other issues relating to the Services;
- n) Comply with legal or regulatory requirements that may be applicable to it;
- o) Investigate, prevent, or take action regarding illegal activities, suspected fraud and situations involving potential threats to the safety of any person;
- p) Disclosure as required to government authorities in compliance with applicable law;
- q) Investigating, and resolving any disputes or grievances in relation its products and services; and
- r) Any other purpose as may be required under applicable law.

The Website uses temporary cookies to store certain data (that is not sensitive personal data or information) which is used by us and our service providers for the technical administration of the Website, for research and development, and for user administration. In the course of serving advertisements or optimizing services to you, we may allow authorized third parties to place or recognize a unique cookie on your browser. The cookies however, do not store any Personal Information that belongs to you. You may adjust your internet browser to disable cookies. If cookies are disabled you may still use the Website, but the Website may be limited in the use of some of the features.



6. DISCLOSURE AND TRANSFER OF PERSONAL INFORMATION

We disclose and in some cases transfer your Personal Information to such entities as required to provide Services to you. These entities may be located outside India. You hereby consent to such transfer and/or disclosure. We require such entities to protect your information through equivalent security measures in comparison to measures taken by us.

An indicative list of the entities with whom we may disclose or transfer Personal Information is provided below:

- a) **Third Party Service Providers**: We share limited Personal Information such as name, mobile number, etc. with third party strategic partners to enable them to offer value added services to our customers. We also share certain personal data with companies that provide other Services on our behalf, such as website hosting, data storage, software services, email services, marketing, fulfilling customer orders, providing payment services, data analytics, providing customer services, and conducting surveys. These companies, irrespective of their location, are obligated to protect your data. In addition, in the event of a merger, reorganization, acquisition, joint venture, assignment, spin-off, transfer, asset sale, or sale or disposition of all or any portion of BPCL's business, including in connection with any bankruptcy or similar proceedings, BPCL may transfer any and all Personal Information to the relevant third party with the same rights of access and use as provided under this Privacy Policy.
- b) BPCL Group Companies: We may share your Personal Information across different companies that are affiliates, associates, or are otherwise controlled by / under the common control of BPCL ("BPCL Group"), to enable us to assimilate user / vendor / dealer information and create singular profiles, which may enable us to offer personalized Services, cross-sell products offered by other members of the BPCL Group, and undertake relevant marketing initiatives, etc. For the purposes of this clause, the term 'control' shall have the meaning ascribed to it under the Companies Act, 2013.
- c) Law Enforcement Agencies: We may share information with law enforcement agencies pursuant to lawful requests for information, and otherwise as required under any law applicable at the given time.
- d) **Others**: We may also disclose Personal Information, to our legal advisors, consultants, etc. if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.

7. USER RIGHTS

We take reasonable steps to ensure that your Personal Information is accurate, complete, and up to date. However, you have the responsibility of ensuring that you review the accuracy of information provided by you and contact us in case of discrepancies, or in case you wish to discontinue the use of our Services. You have the following rights with regard to your Personal Information:

a) Access to Data:

You have the right to access your Personal Information, and request review, correction and deletion.

b) Withdrawal of Consent:

You are free to not share any Personal Information that you consider confidential, and withdraw your consent from us using such data that you have already provided. In the event that you refuse to share



any information, or withdraw consent to process any Personal Information that you have previously given to us, we reserve the right to restrict or deny the provision of our services for which we consider such information to be necessary.

c) Grievance Officer:

You may contact Mr. Chaitanya Govande, Chief Manager (Brand & PR), (<u>govandec@bharatpetroleum.in</u>) to exercise any of these rights. We will respond to your request within a reasonable time.

8. INFORMATION RETENTION POLICY

We store your Personal Information as well as information shared by vendors, dealers and distributors etc., that is collected through the Website, in accordance with applicable laws, which means that we keep your Personal Information for as long as necessary to provide you with our services, or for the term of any contract executed with us, or for as long as may be required under applicable law. We store your Personal Information for lawful purposes only. We may also keep de-identified data for research and statistical purposes for a longer period, subject to applicable legal requirements.

If you close / delete your account, we have no obligation to retain your Personal Information, and we may delete any or all of your data without liability. However, we may retain data related to you if we believe it may be necessary to prevent fraud or future abuse, or if required by law, or for other legitimate purposes.

9. CONFIDENTIALITY & INFORMATION SECURITY POLICY

We use reasonable technical, administrative, and physical security measures for the purpose of safeguarding all data you share with us, and have internal policies in place to prevent unauthorized access to your data. For example, credit/debit card details are stored in a secure way by using the Payment Card Industry Data Security Standard (PCI DSS). We also take adequate steps to ensure that the third parties with whom we may share data, also adopt reasonable level of security practices and procedures to ensure the privacy and security of your Personal Information.

It is important for you to protect against unauthorized access to your password, your computer and your mobile phone. Be sure to log off from the Website when finished. We do not undertake any liability for any unauthorised use of your account and password. If you suspect any unauthorized use of your account, you must immediately notify us by sending an email to (info@bharatpetroleum.in). You shall be liable to indemnify us due to any loss suffered by us due to such unauthorized use of your account and password.

However, we are not responsible for any loss, unauthorised access, safety issue or any harm caused to you by any misuse of your Personal Information, unless it is a direct and foreseeable consequence of negligence and non-compliance on our part only. We are not responsible for the confidentiality, security or distribution of your Personal Information by our partners and third parties outside the scope of our agreement with such partners and third parties. Further, we shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond our reasonable control including but not limited to, acts of government, computer hacking, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of Internet service or telephone service on your part. You hereby acknowledge that we are not responsible, in particular, for any third party action or action on your part leading to loss, damage or harm to you or any other person.



10. WEBSITE COMPLIANCE POLICY

Note that this Website complies with W3C standards. W3C standards define an Open Web Platform for application development that has the potential to enable developers to build rich interactive experiences, powered by vast data stores, which are available on any device. Although the boundaries of such platforms continue to evolve, industry leaders speak nearly in unison about how HTML5 will be the cornerstone. But the full strength of the platform relies on many more technologies that W3C and its partners are creating, including CSS, SVG, WOFF, the Semantic Web stack, XML, and a variety of APIs.

W3C develops these technical specifications and guidelines through a process designed to maximize consensus about the content of a technical report, to ensure high technical and editorial quality, and to earn endorsement by W3C and the broader community.

11. THIRD PARTY WEBSITES AND SERVICES / HYPERLINK POLICY

At BPCL, we strongly believe that the Internet is an important medium to connect with our stakeholders. To this end, we encourage third parties to hyperlink to our Website / web pages. Also, we may occasionally display a link to a third party website, which we feel will be useful to our stakeholders and visitors and give you the ability to access such third party websites, products, and services.

In such instances, please note that BPCL will not be responsible for the content and reliability of the linked websites and does not necessarily endorse the views expressed in them. Any hyperlink to external website(s) which contains downloadable software is provided solely for your convenience. We will not be responsible for any difficulties you may encounter in downloading the software or for any consequences of having done so.

Please note that by clicking on a hyperlink and visiting an external website, you will be subject to the terms of use and privacy policy of that website. We are not responsible for the privacy practices employed by those third parties or in the case of registration for our Services through third party website, nor are we responsible for the information or content their products and services contain. Please read the privacy policies of any third party before proceeding to use their websites, products, or services.

12. MODIFICATIONS/UPDATES TO PRIVACY POLICY*

As there may be new versions of the Website released from time to time, modifications/updates may be effected to this Privacy Policy, or even for other reasons. We reserve the right to make changes to the Privacy Policy at any time, and we would request you to periodically review the Privacy Policy. Please note that your continued use of the Website will be construed as you providing your consent and acceptance of any modifications to the Privacy Policy. If you do not agree with any such revised terms, please refrain from using our products or services and contact us to close any account you may have created.