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Highway Industries Ltd. Site I, II, III, IV & Corporate Office	INTERNAL PRIVACY POLICY	Doc. No.:	<u>MS-PL-43</u>
		Revision	<u>0</u>
		Date:	<u>22-2-2025</u>

HIGHWAY INDUSTRIES LIMITED
INTERNAL PRIVACY POLICY

1. Background

This privacy policy (**Privacy Policy**) governs the collection, use, storage, disclosure, transfer or processing of personal information (**PI**) or sensitive personal information (**SPI**) by Highway Industries Limited (**Company, we, our, or us**) from our employees, apprentices and interns (**you or your**).

The Privacy Policy provides information regarding:

- The PI that we collect, and the purpose for this collection;
- The usage of your PI, including how we share such information with third parties; and
- Your rights.

2. The Information That We Collect

Any PI or SPI that we collect in accordance with this Privacy Policy will be collected by us and retained by us at :

1. Highway Industries Limited, Phase VIII, Focal Point, Mangli, Ludhiana – 141 010 (Punjab)
2. Highway Industries Limited, GT Road, Sahnewal – 141 120 (Punjab)
3. Highway Industries Limited , Gill Chowk, Ludhiana – 141 116 (Punjab)
4. Highway Industries Limited, Gat.No 611/1/1, Kuruli, Chakan,Pune – 410 501 (Maharashtra)
5. Highway Industries Limited, 135 R,Narsinghpur, Mohammadpur, Village Jharsa, Gurugram – 122 004 (Haryana)
6. Highway Industries Limited, T-14, Salcon Rasvilas, Saket District Centre, Delhi – 110 017


The kinds of PI which you may be required to provide are:

- Name;
- Contact information, such as phone number and email ID;
- Residential address.

The kinds of SPI that you may provide us for the provision of our services are:

- Financial information such as bank account details;
- Physical health condition;
- Medical records and history;
- Biometric information.
- Income Tax related documents / declarations

You may also choose to provide your Aadhaar details for identification purposes. Please note that it is not mandatory for you to provide your Aadhaar details for identification purposes, and you may provide other identification documents such as PAN card, passport or driving license. We will not be sharing your Aadhaar details further with third parties without your consent or in a manner non-compliant with

Prepared by:- <u>Trilegal</u>	Checked by:- <u>Rajesh Kumar Keshry</u>	 Approved by MD
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this Privacy Policy. We do not retain your Aadhaar details for longer than required for these purposes and will keep your Aadhaar details secure and confidential in accordance with applicable laws.

Do note that we collect your SPI and Aadhaar information only based on your explicit prior consent, which you provide us when you click on "Yes" on the relevant consent form, for the collection, storage, use, processing, sharing and/ or transfer of such information, as applicable, in the manner provided under this Privacy Policy.

3. Uses of Information

We may collect your PI or SPI from you in order for us to provide you the services you request from us. PI and SPI is collected from you only when it is necessary for one or more of the following purposes:

- Where necessary to comply with the Company's legal obligations;
- To maintain personnel records;
- To enable communications in relation to the professional engagement;
- To create identification mechanisms;
- For the purposes of administering leaves, bonuses and other benefits;
- For providing you remuneration and establishing accounts with us;
- To undertake performance management and training; and
- To create a safe and secure working environment.

4. Your Rights

Please note that you may exercise the following rights under this Privacy Policy in relation to your PI:


Right of Access and Modification: You may access your information at any time to review any PI that you have provided us, and may modify any inaccurate information, by sending a mail to our Grievance Officer using the details mentioned below.

Right to Withdraw Consent: You may withdraw your consent provided to us for the processing of your PI by sending a mail to our Grievance Officer using the details mentioned below. Please note, however, that this may lead to a discontinuation in discharging the purposes for which such PI is collected.

Security and Confidentiality: We strive to ensure the security, integrity and privacy of your PI and to protect your information against unauthorized access or unauthorized alteration, disclosure or destruction. We adopt adequate measures to prevent unauthorized access to your information and have implemented the ISO/IEC 27001:2013 standards as prescribed under applicable law.

5. Disclosures and Transfer

All PI and SPI that we collect is disclosed or transferred only under the following circumstances and only to entities/individuals who adhere to similar levels of security standards as maintained by us to ensure security, integrity and privacy of your information. Such entities/individuals are identified below:

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Disclosures to affiliates/group companies: We and our affiliates/group companies receive information from and share information with each other for the purposes of your employment or engagement with us.

Mandatory Disclosures or Transfers: As required by (a) applicable laws; (b) any judicial or governmental proceeding.

Disclosures or Transfers to Service Providers: We will share PI with third parties who perform services on our behalf, such as HR services, financial and accounting support, credit control, record keeping and payroll services.

Corporate Changes: In relation to the sale of our business or assets or an acquisition of our business by a third party or any other M&A transaction that involves us.

Some of the aforementioned entities/individuals we may share your PI or SPI with may be located outside India. Where we transfer your PI or SPI outside India, we will ensure that such overseas entities/individuals receiving the PI or SPI also adhere to similar levels of security standards as maintained by us.

6. Data Retention

All PI and Aadhaar information will only be collected and retained by us only so long as it is necessary for the purposes for which it was collected, as detailed above.

7. Amendments to this Privacy Policy

We may revise the Privacy Policy from time to time. Any such changes will be posted on our Intranet (accessible here).

We may not be able to separately notify you of the revisions each time that we make them. Therefore, we would encourage you to check the Intranet periodically to identify any changes to the Privacy Policy in terms of its implications. We will not be responsible for your failure to remain informed about such changes. However, where required under applicable law, we will obtain additional consent from you for such changes.

8. Grievance Officer

If you have any concerns or questions in relation to this Privacy Policy, or wish to exercise any of your rights mentioned in Section 4 above, you may address them to our Grievance Officer whose details are as follows:

Name: Satish Arora

Designation: General Manager - HR

Email: hr.mangli@highwayindustries.co

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