

Privacy Policy

Purpose

This Policy specifies the special rules applicable to the management of Personal Information, in addition to the rules related to Confidential Information contained in the HRID Data Governance Policy. The Policy applies whether such Personal Information is managed by Honda R&D (India) Pvt. Ltd. (HRID) or a third party.

Definition of “Personal Information”

For purposes of this Policy, “Personal Information” means Confidential Information which is the personally identifiable information of customers, associates, or business partners, as defined by applicable laws, regulations, and industry standards.

Scope

The HRID Privacy Policy applies to:

- All HRID Locations and Operations.
- All HRID and other third-party employees (hereinafter called “Associates”).
- Every Associate shall ensure that the content of this Policy is extended to business partners (including suppliers and vendors) by an appropriate agreement to the extent possible.

Amendments to Policy

- 1) Any revisions to the Company Procedures or any Appendixes thereto shall be determined by the HRID Data Governance Committee.
- 2) This Policy shall be reviewed every year or as and when required in order to continuously improve and enhance HRID management of personal information and to meet changes in HRID business environment or in the legal environment.

Personal Information Management Organization and Structure

Chief Privacy Officer

Where required by local laws and regulations or deemed appropriate by the HRID Data Governance Committee (for instance, where a strong centralized response to issues involved Personal Information handling is necessary, the chairperson of HRID Data Governance Committee or his designee may be appointed as the Chief Privacy Officer of HRID.

The roles of a HRID Chief Privacy Officer are specified as follows:

- (1) To proactively implement policies and programs to enhance the protection of Personal Information, to promote such programs, and to create training programs designed to bolster the handling of Personal Information;
- (2) To report to the Regional Data Governance Committees and all other appropriate parties when a leakage or violation occurs within the Company, and to formulate and implement corrective measures; and
- (3) To act as the representative of the HRID in collaborating with the government to formulate industry standards, regulations, and laws, and in responding to government requests.
- (4) Such other responsibilities as may be required by law.

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Role of HRID Data Governance Committee

In the event HRID appoints a Chief Privacy Officer (CPO), the HRID Data Governance Committee shall assist the CPO in discharging responsibilities related to Personal Information management and regulatory compliance.

Where no Chief Privacy Officer is appointed, the HRID Data Governance Committee shall:

1. Implement programs and policies to enhance the protection of Personal Information at HRID;
2. Issue internal communications and guidelines, as appropriate, relating to the handling of Personal Information at HRID.
3. Define requirements for the lawful and secure handling of Personal Information and organize necessary training and awareness programs.
4. Notify the Regional Data Governance Committee in case of any violation, leakage, or breach of Personal Information, and where required, coordinate reporting to relevant authorities and affected individuals in accordance with applicable laws, while maintaining appropriate records.
5. Represent HRID, where required, in interactions with regulatory or governmental authorities on matters relating to Personal Information protection.
6. Develop, implement, and periodically review measures to identify and mitigate privacy risks within HRID, and monitor changes in applicable data protection laws and regulatory requirements in India.

Role of Regional Data Governance Committee

Regional Data Governance Committee shall:

1. Develop and implement appropriate measures to mitigate privacy risks within the region
2. Collaborate with Company Data Governance Committees to collect information on personal data protection laws and related regulations in each country in the region

Duties of Personal Information Manager

Responsibilities of Division Head

1. For each system (of whatever kind) containing Personal Information collected or used by his or her Division, the Division Manager shall appoint a person to supervise the system and to ensure that appropriate confidentiality measures are in place. The supervisor shall ensure that associates who handle Personal Information are identified.
2. The Division Manager of the division that collects or uses Personal Information shall bear responsibility for the proper maintenance and use of systems containing Personal Information within the division.

Training

1. HRID Data Governance Committee shall train associates regarding the appropriate handling of Personal Information and shall maintain a record of such training.
2. Where the handling of Personal Information is entrusted to a business partner, the Division Head of the Division that collects or uses such Personal Information shall ensure that the business partner trains its associates regarding the handling of Personal Information. In addition, when the Division Head entrusts it to the business partner, the Division Head must stipulate in a contract that the business partner holds the training.

Assessment and List of Locations Where Personal Information is Stored

In order to evaluate the type of Personal Information collected or used by each Division, each Division Head shall prepare a list of places (including electronic systems) where Personal Information so collected or processed is stored shall submit this list to the HRID Data Governance

Committee.

Notwithstanding the preceding provisions, it is not necessary to list categories or types of Personal Information which have been classified as Secrecy B.

The Division Head shall update the list required by this section when the division stops collecting or using a listed type or category or information

Supervision of Associates

Where a Division or Department collects, uses, or manages Personal Information, the Division or Department Head shall ensure that associates under his or her supervision are appropriately trained with respect to the handling of Personal Information and that they understand the importance of handling such information with enhanced care, the systems for handling such information, and the consequences of failing to properly manage such information.

Outsourcing Management of Personal Information to Business Partners

Where it is necessary to outsource the collection or use of Personal Information to a business partner, the Division Head shall:

1. Confirm that the business partner has sufficient systems, policies, and practices in place to protect such Personal Information, to a standard comporting with the HRID requirements for handling of Personal Information;
2. Conclude a Confidentiality Agreement with the business partner which shall include specific provisions describing requirements for handling of Personal Information;
3. Prohibit subcontracting in general with respect to handling of Personal Information and require that the business partner obtain the prior written agreement of the HRID if subcontracting with respect to handling of Personal Information is unavoidable;

Collection and use of Personal Information

Collection

When the HRID collects Personal Information, it shall state the use and purpose to which it shall put such information.

Notification

At the time that HRID collects Personal Information, HRID shall notify the person to whom the Personal Information belongs. Such notification may take any form (as specified by the HRID) and shall include the following elements:

1. The identity of the HRID contact information with respect to the personal Information management;
2. The manner in which Personal Information has been (or will be) collected (for example, the use of cookies in a web browser) and the purpose for which it will be used;
3. The estimated period for which the Company will maintain the Personal Information;
4. If necessary under local laws and regulations, the right of the person to whom the Personal Information belongs to request that HRID correct, delete or suspend the use of the Personal Information, and the method of exercising that right;
5. Any other entities which may receive the information; and
6. Any other notice requirements provided by applicable local laws or regulations.

Sensitive Personal Information of Persons Who are Not Associates or Business Partners

1. In general, the HRID shall not collect or use the following types of information with respect to persons who are not Associates or business partners:
 - a) Matters concerning the faith or religious beliefs of a person;
 - b) Race, ethnicity, family status, physical or mental disorders, and criminal history, except to

- the extent required or permitted by law;
- c) Matters concerning execution of the right to organize, collectively bargain and any other group movement by workers;
- d) Matters concerning political participation or beliefs of a person; and
- e) The matters concerning health and medical treatment, and sex life.

Transfer of Personal Information Between Countries

1. Where required under applicable Indian laws, regulations, or industry standards, HRID shall obtain the necessary consent or provide appropriate notice before transferring Personal Information outside India.
2. Prior to transferring Personal Information collected by HRID to Honda group companies or affiliates located outside India, HRID shall ensure compliance with applicable data protection laws, including informing the concerned individual of such transfer, where legally required.
3. HRID shall ensure that any cross-border transfer of Personal Information is carried out with appropriate safeguards and in accordance with internal policies and regulatory requirements.

Requests by Owners of Personal Information

Requests for Disclosure of Personal Information

With respect to Personal Information collected or used by HRID, if required by local laws and regulations and upon request by the person to whom the Personal Information belongs, to disclose the following:

1. The kind of Personal Information collected or used and, to the extent possible, the sources of such Personal Information; and
2. The identity of any third parties, if any, to whom the Personal Information has been disclosed, and the reason(s) for such disclosure.
3. If the person has a right to request correction, deletion, or suspension under local laws or regulations, the disclosure shall so state.
4. Any other information required by law.

The appropriate form of disclosure requests and of the disclosures themselves, including the security requirements necessary to verify the identity of a person requesting disclosure, shall be decided by the HRID Data Governance Committee.

The Division Head shall have ultimate responsibility for determining whether a disclosure request for Personal Information has been appropriately made.

In addition, if the disclosure meets any of the following criteria, the HRID Data Governance Committee shall determine whether disclosure is appropriate:

1. If disclosure may threaten the life, body, property, or other right or interest of the person to whom the Personal Information belongs or a third party; and
2. If disclosure would violate applicable laws or regulations.

If a disclosure request was not appropriately made or the HRID Data Governance Committee determines that disclosure is inappropriate for the reasons listed in the preceding Paragraph, the HRID shall timely notify the person to whom the Personal Information belongs of the denial and the reason for it.

Correction

If required by local laws or regulations, the HRID shall create a procedure for the person to whom the Personal Information belongs to request that HRID correct the Personal Information.

Deletion or Suspension of Use

If required by applicable laws or regulations, the HRID shall implement a method for the person to whom the Personal Information belongs to request deletion or suspension of use of the Personal Information when the following criteria are met:

1. If the Personal Information is no longer necessary for the purpose for which it was collected or used;
2. If the agreement to process the data is canceled, the valid period of agreement to keep the data has expired and there is not any legal ground to process the data; and
3. If the person to whom the Personal Information belongs objects to its further collection or use on legal grounds.

The HRID may elect to retain or continue the use of Personal Information that has been requested for deletion or suspension, if retention or continued use would:

1. Be necessary to protect the public good, whether for health and safety or other reasons.
2. Serve the purpose of historical, statistical, or scientific research; or
3. Be necessary to maintain compliance with applicable statutes or regulations.

The use of Personal Information shall be restricted in the following situations:

1. While the Personal Information is being corrected, if the person to whom the Personal Information belongs has made a valid request for correction.
2. When HRID does not need Personal Information for business purposes but it is being preserved as evidence; or
3. If the person to whom the information belongs objects to deletion of Personal Information because the method of processing is illegal and the person to whom the information belongs requests HRID to restrict its use until the validity of the processing method is established.

Designation of contact for requests related to Personal Information

HRID Data Governance Committee shall establish a contact for inquiries related to personal information, including requests for deletion, correction, or suspension of use and prominently display that contact information to the public.

Action in case of Information Leakages that Include Personal Information

Response to a Leakage Involving Personal Information

In the event of a leakage or loss of Personal Information, in addition to following the processes described in HRID Data Governance Policy Section 3.7 Violations, the Chief Privacy Officer of the (or the HRID Data Governance Committee, as appropriate) shall evaluate the scope of the leakage or loss, the identity of persons affected by the leakage or loss, the appropriate notice(s) to be given, and shall effect such notice(s).

In addition, the Chief Privacy Officer shall report any such incident to the Risk Management Officer and the Chief Compliance Officer.

Details of Grievance Officer

Office Address

Data Governance Committee, Chairman

Honda R&D (India) Pvt. Ltd.

Plot No. 2 Sector 3, IMT Manesar, Gurugram, Haryana 122052

Email : info@honda.hrid.in

Note: Emails received on mail id of Grievance Officer other than context of Privacy Policy will not be attended. Please do not send emails to this Id for queries, complaints etc.