

PROTECTING YOUR PRIVACY – OUR COMMITMENT

At Tata Communications, we value your privacy. Regardless of whether you are our customer, a visitor to one of our various Tata Communications websites, or someone we deal with in our ordinary course of business, protecting your privacy is important to us and is a responsibility that we take very seriously.

In this Privacy Policy (the “Policy”), we describe how we collect, use, and disclose information that we obtain and what your rights are in this regard. This Policy applies to the Tata Communications Group of Companies, which includes Tata Communications Ltd. and all its wholly-owned subsidiaries. For the purposes of this Policy, any reference to “Services” is a reference to all the products and services offered by Tata Communications, whether available online or offline, and any reference to “Sites” is a reference to any of the Tata Communications websites (including any mobile version of such websites), whether operated under the banner of Tata Communications or a brand name that we wholly own.

By using our Sites or our Services, or otherwise providing information to us, you agree that your personal information will be handled as described in this Policy. You also agree to the terms for accessing and correcting data as described in this Policy. Your use of our Sites or Services, and any dispute over privacy, is subject to this Policy and our Terms of Service (which are incorporated by reference into this Policy). Depending upon your interactions with Tata Communications, other terms may also be applicable to you.

THE INFORMATION WE COLLECT

Information We Collect Directly From You. When you communicate or do business with us, we collect information from you, and this may include personal information. For example, we collect information from you when you sign up for our Services, create an online account with us, make a purchase, request information, submit a trouble ticket, participate in a contest or survey, or otherwise

contact us. The type of information that we collect depends on your interaction with us, but may include, where permitted by applicable law, the following: your name, company name, email address (business or personal), mailing/billing address (business or residential), credit card/billing information, telephone number (business or personal), and any other information that you choose to provide.

Information We Collect Automatically. We automatically collect the following information about your use of our Sites or online Services through cookies, web beacons, log files and other technologies: your domain name, your browser type and operating system, web pages you view, links you click, your IP address, the length of time you visit our Sites or use our Services, your activities on our Sites or Services (including your movement through our Sites), and the referring URL or the webpage that led you to our Sites. Please see the section “Our Use of Cookies and other Tracking Mechanisms” below for more information.

We may use the information we collect from you in aggregated form or we may associate it with your username and other personal information that we collect about you. We may also combine information collected about you on one of our Sites with information collected through one or more of our other Sites or through your use of our Services for the same purposes as we would use such information in non-combined form. We explain how we use and disclose the information we collect about you below.

Information About Your Use Of Our Services. Where permitted by applicable law, we also collect information about your use of our telecommunications and interconnected voice over internet protocol (VoIP) services (including services purchased offline), such as call records (excluding the content of the calls), minutes used, features used and traffic data, amongst other data.

Information We Collect About You From Third Parties. We also may collect information about you, such as name, contact, or demographic information from third party sources, such as research service providers. Where permitted by applicable law, we may combine this data with information that we already maintain about you. We will use this information as described in this Policy.

HOW WE USE THE INFORMATION WE COLLECT

We use the information that we gather about you for the following purposes:

- To provide our Services to you, to communicate with you about your use of our Services, and to fulfill your orders.
- For the purpose for which you specifically provided the information to us, including, to respond to your inquiries, to provide any information that you request, to address trouble tickets, and for providing customer service.
- Where permitted by applicable law, to deliver customized content to you, to offer location customization, personalized help and instructions, and to otherwise personalize your experiences while using our Sites or our Services.
- For marketing and promotional purposes, for example, where permitted by applicable law, we may use your information, such as your email address, phone number, or mailing address to contact you with newsletters, special offers and promotions, or to otherwise contact you about products or information we think may interest you including voice, data, and internet communications products and services, as well as to track the success of our marketing and advertising campaigns.
- As permitted by applicable law, to assist us in advertising our products and services in various mediums including, without limitation, sending promotional emails, advertising our services on third party sites and social media platforms, direct mail, and by telemarketing.
- To better understand how users access and use our Sites and Services, both on an aggregated and individualized basis, to administer, monitor, and improve our Sites and Services, for our internal purposes, and for other research and analytical purposes.
- To protect our customers, employees or property — for instance, to investigate fraud, harassment or other types of unlawful activities involving Tata Communications or other carriers that we do business with, and to enforce this Policy, as well as our Terms of Service.

HOW WE SHARE THE INFORMATION WE COLLECT

We may share your information as follows:

- **Affiliates.** We may disclose the information we collect from you to our subsidiaries. Our subsidiaries may use your information for the purposes indicated in this document, including, to market their products and services to you, to the extent permitted by law.
- **Marketing Partners.** We may jointly offer a product or service, such as voice, data and internet communications products and services, with third parties who are system integrators, resellers, solution partners, network partners and affinity organizations. If we do so, we may share your information, such as your email address, phone number, or mailing address, with these third parties to assist in providing and marketing that product or service to you, as well as to enable the third parties to market their own products and services to you. We also may share your information with companies that are system integrators, resellers, solution partners, network partners and affinity organizations, and whom we believe might offer products and services of interest to you; these companies may market to you, and may share information with you about their voice, data, and internet communications products and services.

- **Service Providers.** We may disclose the information we collect from you to third party vendors, service providers, contractors or agents who perform functions on our behalf. We take steps to ensure that third party contracts contain appropriate data protection and security language. These third parties include other carriers or providers where necessary to provide our Services or fulfil your requests or orders, as well as entities that provide website hosting, service/order fulfilment, customer service, and credit card processing, among others.

We may also share your information in the following circumstances and with the following persons/entities:

- **Other Purposes for Which We May Seek Your Consent:** From time to time, we may seek your consent to use your information for a purpose not described in this Policy. We may also share your personal information with third parties under other circumstances where we have your consent. For example, we may offer you the opportunity to participate in a survey or promotion; where applicable, your information will be used and shared as described in the instructions/rules to that survey and/or promotion.
- **Business Transfers.** If we are acquired by or merge with another company, or if substantially all of our assets are transferred to another company (which may include as part of bankruptcy proceedings), we may transfer the information we have collected from you to the other company.
- **In Response to Legal Process.** We may disclose the information we collect from you in order to comply with applicable law, judicial proceedings, a court order, or other legal process, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We may disclose the information we collect from you where we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Service or this Policy, or as evidence in litigation in which we are involved.
- **Aggregate and De-Identified Information.** We may share aggregate or de-identified information about users with third parties for marketing, advertising, research or similar purposes.

JOB APPLICANTS

If you submit your resume or otherwise apply for a job with Tata Communications, we use and disclose the information you submit for employment consideration only unless we otherwise obtain consent from you.

OUR USE OF COOKIES AND OTHER TRACKING MECHANISMS

On our Site, we and our third party service providers use cookies, including third party analytics services (such as Google Analytics), as well as other tracking mechanisms such as clear GIFs or pixel

tags, to track information about your use of our Sites or Services, to facilitate your use of our Site and Services, to improve our Site and Services, for advertising purposes (including to evaluate the success of our advertisements), and as otherwise described in this Privacy Policy and our [Cookie Policy](#). We may combine this information with other personal information we collect from you. In addition, we and our service providers may use clear GIFs in HTML e-mails to our customers, to help us track e-mail response rates, identify when our e-mails are viewed, and track whether our e-mails are forwarded. For information on the specific tracking mechanisms that we use on our Sites and the purposes for which we use such tracking mechanisms and how to disable them, please see our [Cookie Policy](#).

Currently, our Sites do not recognize browser requests not to be tracked. As set forth in our [Cookie Policy](#), however, you may disable cookies yourself through your browser settings. You also may opt-out of targeted advertising, as mentioned below.

THIRD-PARTY AD NETWORKS

We may use third parties such as network advertisers to display advertisements about Tata Communications on third party websites. Network advertisers display advertisements on third-party sites, based on your visits to our Sites as well as other websites. This enables us and these third parties to target advertisements by displaying ads for products and services in which you might be interested.

Third party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other technologies to measure the effectiveness of their ads, to personalize advertising content to you, and to track your movements on our Sites and on other third party sites. These third party cookies and other technologies are governed by each third party's specific privacy policy, and not this one. We may provide these third-party advertisers with de-identified information about your usage of our Sites and our Services, as well as aggregate information about visitors to our Sites and users of our Services; however, we do not share your personal information with these third parties.

You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative (“NAI”), the Digital Advertising Alliance (“DAA”), or, in Europe, the European Interaction Digital Advertising Alliance (“EIDAA”). For more information regarding this practice by NAI, EIDAA members and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI, DAA, and EIDAA members, please visit their respective websites: www.networkadvertising.org/optout_nonppii.asp, www.aboutads.info/choices, and www.youonlinechoices.com.

COMMUNICATIONS AND MARKETING

Where permitted by applicable law, we may send periodic promotional or informational emails to you. You may opt-out of such communications by following the opt-out instructions contained in the e-mail or through the instructions in this link: <http://info.tatacommunications.com/UnsubscribePage.html>. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt-out of receiving emails about recommendations or other information we think may interest you, we may still send you e-mails about your account or any Services you have requested or received from us.

USER GENERATED CONTENT

We may invite you to post content on our Sites, including your comments, pictures, and any other information that you would like to be available on our Sites. If you post content to our Sites, the information that you post will be available to other visitors to our Sites. If you post your own content on our Sites or Services, your posting may become public and we cannot prevent such information from being used in a manner that may violate this Policy, the law, or your personal privacy.

THIRD-PARTY LINKS

Our Sites and our online Services may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third party websites. We are not responsible for the information practices of such third party websites.

Our Sites may include social media plugins such as “like” and “share” buttons. By clicking on such a plugin, the data you want to like or share will be provided to the relevant social media site. We are not responsible for the practices of such third party social media sites once you have clicked on any such “like” or “share” button.

SECURITY

To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, we have put in place physical, electronic, and managerial procedures to safeguard and secure the information we collect through our Sites and the provision of our Services. Despite our best efforts, you will appreciate that no data security measures can guarantee 100% security.

You should therefore take steps to protect against unauthorized access to your password, phone and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen or compromised passwords, or for any activity on your account via unauthorized password activity.

SPECIAL INFORMATION FOR CONSUMERS IN CALIFORNIA, U.S.A.

As described in this Policy, we may make your personal data available to third parties for their marketing purposes. If you do not want us to share your personal data with third parties, you may opt-out of this information sharing by making a request [here](#).

If you are a California resident, then, subject to certain limits under California law, you may ask us to provide you with a list of certain categories of personal data we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year as well as the identity of those third parties. To make such a request, residents of the State of California may contact us through our dedicated privacy portal accessible [here](#).

HOW TO ACCESS, CORRECT, AMEND OR DELETE YOUR INFORMATION

To access, correct, amend, or delete your account information and other personal information that the Company may be storing about you (for example, your name, address, or billing information), you may contact your customer service representative or send an email to the following address: [Legal Compliance](#). To protect your privacy and security, we will also take reasonable steps to verify your identity.

TRANSFER OF PERSONAL INFORMATION BETWEEN COUNTRIES

Tata Communications may transfer personal information across national borders. Your personal information may be transferred to and processed by other Tata Communications entities and third parties for the following purposes, where permitted by local law: to fulfill our contractual obligations to you, to manage your account, for business operations (e.g., order management, billing, client services), to monitor compliance with our policies and procedures, to improve our products and services, to monitor compliance with law, and for other purposes for which we may notify you from time to time. We may also transfer your personal information to third party service providers from whom we purchase software that we use for the purposes of managing your account, business operations, and, in accordance with applicable law, identifying new products or services which may

be of interest to you. These third-party service providers host our data and may use a cloud solution and store data in the United States.

Such other Tata Communications entities and third parties may be located outside of your country of residence and that transfers to the same may include transfer to, and processing in, countries such as the United States and India which may not provide an equivalent level of data protection laws as the laws in your country of residence.

Any such transfer will occur either on the basis of any consent you have provided or on the basis of EU Commission-approved model clauses (which seek to ensure an equivalent level of protection for your personal information as provided by your country of residence). As a result of such transfers, your information may be subject to access by law enforcement and government entities in countries other than your country of residence, including courts and tribunals in accordance with laws applicable in those jurisdictions.

Tata Communications takes steps to ensure that your personal information is protected when transferred to and processed by these Tata Communications and other entities, and to ensure that such processing complies with applicable laws. If you have questions about the third parties to whom we have transferred your information, you may email us at [Legal Compliance](#).

OUR COMMITMENT TO GDPR

Tata Communications recognizes that protection of data is increasingly important to individuals, organizations and stakeholders. Accordingly, we must earn the public's trust in their ability to share personal data with us. Tata Communications currently processes and manages personal data in accordance with applicable privacy laws, and specifically, in accordance with the EU General Data Protection Regulation, which is regarded as one of the highest and strictest standards in the world. This Privacy Policy further explains our practices and processes with respect to handling of any Personal Data we receive belonging to customers, suppliers or business partners.

CHANGES TO THIS POLICY

This Policy is subject to change, and any changes to this Policy will be posted on our Sites. All information submitted through the Sites to Tata Communications is subject to the terms and conditions of this Policy, as amended.

HOW TO CONTACT US

You may email us at the following address – please describe the nature of the problem or issue you wish to report in detail, or you may write to us at the following address: [Legal Compliance](#)

Legal Compliance
Tata Communications (America) Inc.
2355 Dulles Corner Boulevard
Suite 700
Herndon, VA 20171
USA

[Click here](#) for details on the data controller for our Sites.

A Data Privacy Schedule for Company Suppliers can be found [here](#)