

	Lowe's India Employee Privacy Policy	
	Policy Number: LSIPL 601	Effective Date: 01/01/2015

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PURPOSE

Lowe's Services India Private Limited ("Company") wishes to maintain appropriate standards and integrity in meeting the requirements of the Information Technology Act's privacy provisions. The purpose of the Lowe's India Employee Privacy Policy ("Policy") is to describe how the Company collects, stores, uses, shares and protects Personal Information related to its Employees and Applicants, along with how those individuals may update or correct such Personal Information. The principles laid down herein shall apply to Personal Information, SPDI, as defined herein, collected by or in the possession of the Company.

NOTHING IN THIS POLICY IS INTENDED TO FORM A CONTRACT OF EMPLOYMENT.

SCOPE

This Policy applies to all Employee Personal Information and SPDI in any form – whether oral, electronic or written – about individuals collected, maintained or used by the Company as part of an actual or prospective employment relationship. It is vital that every Employee complies with the requirements of this Policy and refrain from inappropriately using Personal Information and SPDI, or disclosing it to unauthorized persons. The Company takes great care to protect Personal Information about you and others, and when we use it, we do so with respect to every individual's privacy.

The Company may access or process Personal Information about customers or Employees of Lowe's Companies, Inc., and its subsidiaries, affiliates and agents, who reside outside India. Separate privacy policies or statements may govern that data, and every Company Employee must comply with those policies and statements in connection with the use and access of that data.

1. INTRODUCTION TO THE POLICY

- 1.1. The Company is committed to maintaining the security and privacy of your SPDI (*as defined below*) and takes care in complying with the requirements of the Information Technology Act, 2000 and the rules thereunder, as may be amended from time to time.
- 1.2. The Policy outlines the security practices and procedures of the Company with respect to Personal Information, including SPDI, of Applicants and Employees (*all of which are defined below*) collected by the Company, either directly or through any of

its affiliates or vendors.

2. APPLICABLE LAW AND DEFINITIONS

2.1. This Policy has been drafted pursuant to and in compliance with the following:

- (a) Section 43A of the Information Technology Act, 2000;
- (b) Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (“**SPDI Rules**”); and
- (c) Rule 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011.

2.2. For the purposes of this Policy, the following capitalized terms shall have the meaning assigned to them below:

“**Applicant**” shall mean any individual seeking employment with the Company;

“**Applicant Information**” shall mean information, including but not limited to, the Applicant’s name, address, phone number, identity proof, experience statement, details of current and past compensation, formal educational certificates/documents, professional references, past employment and any other Information considered relevant by the Company for considering the Applicant’s application;

“**Employee**” shall mean any individual who is a current or ex-employee of the Company and, solely for purposes of this Policy, shall include any contract staff engaged by the Company (although this Policy does not create an employer/employee relationship with such contract staff);

“**Employee Information**” shall mean information, including but not limited to, the Employee’s name, address, phone numbers, date of birth, age, experience statement, references, compensation details, bank account details, credit scores, identification proofs, medical records and history, appraisal, feedback, details of family members/dependents (including their name, address, date of birth, identification proofs, medical records and history) and any other Information that (a) the Company considers relevant to its business or job-related decisions about Employees, (b) satisfies government reporting regulations or is required for compliance with applicable law, or (c) is used for payroll and benefits administration;

“**Information**” shall mean Applicant Information and Employee Information, collectively;

“**Infrastructure**” shall mean the Company networks, laptops or any other electronic devices provided to you by the Company for official use;

“**Personal Information**” with reference to any natural person, is defined under the SPDI Rules to mean any information that relates to such person, which, either directly or indirectly, or in combination with other information available or likely to be available to a body corporate, is capable of identifying that person;

“**Sensitive Personal Data or Information (SPDI)**” is defined under the SPDI Rules to mean Personal Information about a person relating to their:

- (a) password(s);
- (b) financial information (e.g., bank account, credit or debit card or other payment instrument details);
- (c) physical, physiological and mental health condition;
- (d) sexual orientation;
- (e) medical records and history;
- (f) biometric information;



- (g) and any detail relating to the above as provided to a company for providing services or, storing or processing such information.

Additionally, for the purposes of this Policy, SPDI may include:

- (a) Contact and identification information, such as name, address, telephone number, email address or other government identifiers;
- (b) Background information, such as education Information and employment history;
- (c) Family information, such as family member names and contact data;
- (d) Performance Information, such as periodic performance self-evaluations and reviews, and other information provided to HR throughout the employment relationship;
- (e) Other Personal Information you provide when you choose to participate in company events. Certain Company events will be recorded and photographed.

Any Information available in the public domain or Information which can be obtained by a governmental agency under the Right to Information Act, 2005 (legislation which requires public authorities to disclose certain kinds of information) or any other law in force is excluded from the definition of SPDI.

Additionally, for the purpose of this Policy, the terms “we”, “us”, and “our” shall mean the Company, and “you” and “your” shall mean the Applicant, the Employee or any person whose Personal Information, including SPDI we collect or have in our possession.

3. PERSONAL INFORMATION WE COLLECT

- 3.1. You may be required to provide Applicant Information at the time of applying for an employment opportunity with the Company.
- 3.2. During the term of your employment, we may collect Employee Information from all our Employees on a regular basis. Some categories of Information qualify as Personal Information and/or SPDI and is treated as such under this Policy.

Personal Information Individuals Provide As defined under the SPDI. Personal Information Collected by Automated Means. The Company may also collect Personal Information by automated means throughout the course of an individual’s employment. For example, the Company may collect records related to an individual’s physical access (e.g., entry/exit/location) to Company facilities through technology that identifies badges or smart keys associated with individuals. Similarly, the Company may use video monitoring and recording at Company facilities to enhance security, protect against theft and other crimes, and to perform analytics.

Most Personal Information collected automatically is collected through Lowe’s owned or operated IT or communications systems (e.g., computers and phones) to which an individual may be provided access. These systems may use various technologies, such as cookies, Web beacons, and automatic server logging to collect and store Information about the use of such systems or specific devices by individuals.

Each individual’s use of or connection to the Company’s information technology systems, whether through Company-provided devices or personal devices (e.g., connecting a personally-owned device to a Lowe’s operated Wi-Fi network) is governed by the Company’s Information Security and Information Technology policies and is subject to monitoring. ACCORDINGLY, THERE CAN BE NO EXPECTATION OF PRIVACY WITH RESPECT TO THE USE OF SUCH SYSTEMS.

Personal Information Collected from Other Sources. The Company may obtain certain Information about individuals from other businesses, such as background checks or updated contact information. The Company may also obtain Information from public sources, such as Information you submit in a public forum as well as from

the Company's affiliates.

- 3.3. The Company is entitled to, and will rely upon the accuracy of the Information furnished by you, whether at the time of your application, joining or thereafter, as well as the accuracy of any SPDI presented or shared during the recruitment process and employment.
- 3.4. We collect your SPDI directly from you. All SPDI provided by you to us is voluntary.
- 3.5. We monitor the Infrastructure for inappropriate use, or use otherwise than in furtherance of the Company's business. In the course of such monitoring we may intercept, extract, process or store Information, including SPDI, from the Infrastructure.

4. USE, DISCLOSURE AND TRANSFER OF INFORMATION

1. The purposes for which your Personal Information and SPDI is used may include any or all of the following:
 - (a) To process, evaluate and respond to your job application with the Company, including for background verification;
 - (b) In relation to ongoing employment matters such as training, confirmations, promotions, transfers, secondments, appraisals, sickness and mid-term vetting;
 - (c) To perform payroll and related administration;
 - (d) To provide for the administration of benefits;
 - (e) To promote Company culture and image when you participate in certain photographed and videotaped Company events, or when you choose to provide such Personal Information when participating in Company events;
 - (f) To process requests in relation to purchase of products or services made available to you;
 - (g) To monitor compliance with the internal rules of the Company (for example the Code of Ethics, and for other compliance, risk management and operational purposes) and if necessary in relation to this, for investigative purposes;
 - (h) To meet legal and regulatory requirements and to comply with applicable law including but not limited to seeking professional, legal or accounting advice;
 - (i) To respond to any queries that you may have and to communicate Information to you;
 - (j) To investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, or as otherwise required by law;
 - (k) Subject to 4.2 below, to disclose and transfer your SPDI outside India to Lowe's Companies, Inc., or its subsidiaries or affiliates, as appropriate in connection with your employment;
 - (l) To disclose your SPDI to companies or individuals who are authorized by us to perform functions on our behalf including but not limited to those which administer benefits, conduct background verification, provide administrative or other services to us such as mailing houses, telecommunication companies, information technology companies, insurance companies or agents, background check vendors;
 - (m) To disclose or transfer your SPDI to a third party who acquires or sells, or proposes to acquire or sell its interests in our business units, whether such acquisition is by way of merger, consolidation or purchase of all or a substantial portion of our assets or is a divestment in part or in full;
 - (n) To facilitate the provision of funds for official travel undertaken by you or



provision of any other reimbursements due to you as per the policies of the Company;

- (o) To disclose your SPDI if legally required to, pursuant to an order from a governmental entity or in good faith. For example, we may disclose the SPDI to:
 - (i) conform to legal requirements or comply with legal process;
 - (ii) protect our rights or property or our affiliated companies;
 - (iii) prevent a crime or protect national or international security; or
 - (iv) protect the personal safety of other Employees or the public at large.

4.2. Subject to applicable law, we may at our sole discretion, transfer your SPDI to another body corporate (*as defined under the Information Technology Act, 2000*). When your SPDI is transferred, the same level of data privacy and security will be applied to such SPDI by third party processors as is applied by us.

5. RETENTION OF INFORMATION

Unless you otherwise consent, we will also put in place measures such that your SPDI in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that SPDI was collected is no longer being served by the retention of such SPDI; and (ii) retention is no longer necessary for any other reason, including for compliance with any applicable law.

6. CONSENT

- 6.1. By becoming an Applicant and/or an Employee of the Company or otherwise submitting your SPDI, you will be deemed to have read, understood and agreed to the practices outlined in this Policy and agree to be bound by the Policy.
- 6.2. You hereby consent to our collecting, monitoring, using, sharing, disclosing, processing, retaining and transferring (including outside India) SPDI as described in this Policy.
- 6.3. You agree and acknowledge that any third party to which we transfer or sell our assets, merge or consolidate with, will have the right to continue to use SPDI provided to us by you, in accordance with this Policy.

7. SECURITY PRACTICES

The Company employs physical, technical, and administrative controls designed and intended to safeguard SPDI against loss, misuse, copying, damage or modification and unauthorized access or disclosure. Some of the security measures adopted by us are:

- (a) We regularly adapt controls to respond to changing requirements and advances in technology and we review our SPDI collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems; and
- (b) We authorize access to your SPDI only to personnel or the Employees/contractors of the Company and / or Lowe's Companies Inc. who need to know that SPDI to process the data or to persons identified under this Policy and who are subject to strict contractual confidentiality obligations, and may be disciplined or whose relationship with us or Lowe's Companies Inc. respectively, may terminate if they fail to meet these obligations.
- (c) We require our Employees to comply with applicable security and data policies and ensure that they use appropriate safeguard to protect Personal Information and SPDI they have access to. Examples include:



- Paper and other hard copies containing Personal Information should be secured in a locked location when not in use and unauthorized copies of such documents should not be made or distributed.
- Subject to the applicable laws, when no longer necessary for business purposes, paper and hard copies containing Personal Information and/or SPDI should be immediately destroyed or discarded using paper shredders or other approved devices or receptacles.
- Computers and other access points to the Company's systems containing Personal Information and/or SPDI should be secured when not in use by logging out or locking.
- Usernames and passwords should be guarded and not shared.
- Electronic files containing Personal Information and/or SPDI should only be stored on secured computers and not copied or otherwise communicated to unauthorized individuals within or outside of the Company.

8. YOUR OBLIGATIONS

1.Compliance Obligations

It is vital that you comply with the terms of this Policy and refrain from inappropriately accessing or using SPDI or disclosing it to unauthorized persons. You must always adhere to this Policy.

2.Updates

Information collected from you at the time of your application for a position of employment / contractual position and throughout the period of your employment is added or updated regularly. Accordingly, it is important that you let your Human Resources know immediately of any changes to your Personal Information.

3.Unauthorized Access

It is important for you to protect against unauthorized access to your password(s), your computer and your mobile devices. Be sure to log off from the devices when finished. We do not undertake any liability for any unauthorized use of your account(s) and password(s). If you suspect any unauthorized use of your account(s), you must immediately notify us by sending an email to the Grievance Redress Officer specified herein.

4.Access to Third Party Websites and Applications

The Company provides Employees with access to third party websites and applications. Your access of such third-party websites and applications shall be subject to the third party's privacy policies and terms of use. The Company is not responsible for the privacy practices or for the content made available on such third-party websites and applications.

2. YOUR RIGHTS

2.1.

9.1. Right to Review

You have the right to access and review the Personal Information and the SPDI you have provided to the Company and we will ensure that all such Personal Information and SPDI found to be inaccurate or deficient is corrected or amended in accordance with your instructions.

2.2.Right to Opt-Out

Subject to applicable laws, you may also opt-out of the collection and use of Personal Information and SPDI or withdraw your prior consent. However, in the absence of Personal Information and SPDI required for the purposes of your



continued employment with the Company, the Company may alter the terms of your employment and you may be unable to continue your employment with the Company.

To exercise any of the rights specified above, please contact the Grievance Redressal Officer specified herein.

3. CHANGES TO THE POLICY AND DISCLAIMER

- 3.1. We reserve the right to amend all or any of the terms of the Policy at our sole discretion without any prior notice. Your continued interest in seeking employment or your continued employment with our Company following any such amendment indicates your acceptance of such amendment.
- 3.2. 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, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of internet service or telephone service, etc.

4. INDEMNITY

You agree and undertake to indemnify us in any suit or dispute by any third party arising out of disclosure of Information, Personal Information or SPDI by you to any other Applicant, Employee, third parties.

5. SEVERABILITY

Each clause of this Policy shall be and remain separate from and independent of and severable from all and any other clauses herein except where otherwise expressly indicated or indicated by the context of the Policy. The decision or declaration by a court of competent jurisdiction, that one or more of the clauses are null and void shall have no effect on the remaining clauses of this Policy.

6. GRIEVANCE REDRESSAL OFFICER

In order to address any discrepancies, grievances and/or feedback that you may have in relation to this Policy there is a designated "Grievance Redressal Officer", whose name and contact details are as below:

Name: Monica Pirgal

Tel: +91 80 67917503

E-mail: PrivacyOfficerIndia@lowes.com

DOCUMENT HISTORY

Version	Date	Release/ Amendments/ Changes Details	Prepared by	Reviewed by	Approved by
1.0	01/01/2015	Initial Release	Tresa Francis	Salil Aroskar	Narayan Ram
1.1	05/16/2018	Revision of Policy	Natasha Wilson	Monica S Pirgal	James Brandt