

## Castrol India Virtual Assistant Privacy Policy and T&C's

### 1. Who we are

When you visit any of our website or apps (the "Digital Asset"), participate in one of our schemes, contact us and/or use our products and services in another way, a member of the bp Group ("bp", "we", "us" or "our") will collect and process your personal information.

This privacy statement details what information we usually collect about you, how we use it, who we share it with and how long we retain it for, in relation to your use of our Digital Assets and the provision of our products and services. If one of our Digital Assets is covered by a supplementary statement, we will ensure that this is available to you.

### 2. Responsible entity

Castrol India Limited, Technopolis Knowledge Park, Mahakali Caves Road, Adheri (East), Mumbai 400093, Maharashtra will be responsible for the processing of your personal information as described in this statement and will act as the controller of such information.

### 3. Information we collect

Personal information, or personal data, means any information about an individual from which that person can be identified directly or indirectly. We obtain most of the information from you. If we don't receive this information from you, we obtain your personal information from other sources, such as third parties and publicly available data sources. We also generate some of the information about you ourselves e.g. through the creation of an authentication ID.

As part of your visit to our Digital Asset and/or your use of our products or services, including WhatsApp, we may process the following personal information about you.

Category	Typical data points	Typical sources
Biographical and Contact Data	Telephone number and postal or email address.	You / API triggered by you
Account Credentials	Usernames, passwords.	You / generated by us
Transaction Data	Details of transactions you carry out through our channels, of the fulfilment of the services we provide and payment details.	You / generated by us
Professional Data	Job title, company name, company email address, business phone number, business address.	You / Third party

Preference Data	Marketing or usage preferences you provide us or that we may infer from the other data provided to us.	Generated by us / Third party
Correspondence	We will typically keep a record of that correspondence. This may include telephone calls, which we record to assist us in training our staff and undertaking quality checks.	You / Transcripts generated by us
Digital Asset Usage Data	IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Digital Assets.	Generated by us or a third party

## Cookie information

When you visit our Digital Asset, cookies (and similar technologies) are used to collect information about your Digital Asset usage. You can set your browser to refuse all or some browser cookies or to alert you when Digital Assets set or access cookies. If you disable or refuse cookies, please note that some parts of this Digital Asset may become inaccessible or not function properly. For more information about the cookies we use, please refer to the Cookies Preferences page available in each of our Digital Assets.

### 4. Why we collect your information and how we use it

When we use your personal information for the purposes outlined in this privacy statement, we ensure that we have a lawful basis to do so. We keep your information secure by implementing appropriate security measures as required by applicable data protection laws.

#### Lawful basis

Where required under applicable law, we ensure that we have a lawful basis to use your personal information for the purposes outlined in this statement. Under the UK and EU GDPR, we will rely on Article 6 lawful bases listed below. We will also rely on one or more of these lawful bases when they are available in other countries:

- **Performance of the contract** we have with you for the provision of our products, services or Digital Assets. Usually, the terms and conditions of your chosen Digital Asset will govern this contract;
- **Our legitimate interests** to use your personal information where it is necessary for our (or a third party's) legitimate interests and those interests do not override your rights, fundamental rights and freedoms. This means we will only use your information for the purposes of a legitimate interest when there is no unfair impact on you;

- **Our legal obligations** we also use your personal information where it is necessary to comply with the law; and
- **Your Consent** if you consent to the processing of your personal information in specific cases. You can withdraw your consent at any time as set out below in the section on Data Protection Rights.

The table below sets out in more detail why we collect and how we use your information and our lawful bases under applicable data protection laws.

Processing activity	Information we use	Relevant lawful bases
<p><b>For customer management purposes and to administer and improve our business (including our services and products).</b> This includes:</p> <ul style="list-style-type: none"> <li>• as part of our user registration process;</li> <li>• corresponding with you;</li> <li>• for the management and administration of our customers and business;</li> <li>• to improve and develop our business (including through training artificial intelligence systems); and/or</li> <li>• to improve the quality, content and relevance of our communications (where you have subscribed to receive our communications) by following your interactions with that communication, such as whether you receive, open or click on a link within an email communication.</li> </ul>	<ul style="list-style-type: none"> <li>• Biographical and Contact Data</li> <li>• Account Credentials</li> <li>• Professional Data</li> <li>• Preference Data</li> <li>• Digital Asset Usage Data</li> <li>• Correspondence</li> </ul>	<p>Legitimate interests (to effectively manage and provide services to you and to improve our services).</p>

<p>For the purpose of verifying and executing transactions you make using the Digital Asset.</p>	<ul style="list-style-type: none"> <li>• Biographical and Contact Data</li> <li>• Account Credentials</li> <li>• Transaction Data</li> </ul>	<p>Performance of a contract</p>
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Processing activity	Information we use	Relevant lawful bases
<p>For maintenance and management of the Digital Asset. This includes:</p> <ul style="list-style-type: none"> <li>• ongoing review and improvement of the information provided on our Digital Assets to ensure they are user friendly and to prevent any potential disruptions or cyber-attacks;</li> <li>• to conduct troubleshooting/ analysis required to detect malicious code/ actors and understand how this may affect your IT system; and/or</li> <li>• for statistical monitoring and analysis of current attacks on devices and systems and for the on-going adaptation of the solutions provided to secure devices and systems against current attacks.</li> </ul> <p>We may also anonymise your personal information for this purpose.</p>	<ul style="list-style-type: none"> <li>• Biographical and Contact Data</li> <li>• Account Credentials</li> <li>• Professional Data</li> <li>• Preference Data</li> <li>• Digital Asset Usage Data</li> <li>• Correspondence</li> </ul>	<p>Legitimate interests (maintaining and managing information technology services, network and data security and fraud prevention).</p>

Processing activity	Information we use	Relevant lawful bases
For the purposes outlined in our Cookies Statement	<ul style="list-style-type: none"> <li>• Account Credentials</li> <li>• Preference Data</li> <li>• Digital Asset Usage Data</li> </ul>	<p>Legitimate interest (providing necessary functionality of our Digital Asset)</p> <p>Consent only where required by applicable data protection law e.g. in relation to information obtained from non-essential cookies and similar technologies. You can withdraw this consent at any time in your cookie preferences.</p>

Processing activity	Information we use	Relevant lawful bases
<p>For analytics, statistical, profiling and insight purposes. This includes:</p> <ul style="list-style-type: none"> <li>• to understand the needs and interests of our customers; • to undertake market segmentation (including for marketing purposes);</li> <li>• to conduct market insight activities; and/or to personalize the Digital Asset or services or communication based on profile data we have applied to you.</li> </ul> <p>We may also anonymise your personal information for this purpose.</p>	<ul style="list-style-type: none"> <li>• Biographical and Contact Data</li> <li>• Professional Data</li> <li>• Preference Data</li> <li>• Digital Asset Usage Data</li> <li>• Correspondence</li> </ul>	<p>Legitimate interest (improving and enhancing our business model and services, better understanding our customers).</p>

Processing activity	Information we use	Relevant lawful bases
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<p>For marketing/ promotional purposes, this includes:</p> <ul style="list-style-type: none"> <li>to communicate with you in order to provide you with information about services, products and/or events that may be of interest to you via email, phone, social media.</li> </ul>	<ul style="list-style-type: none"> <li>Biographical and Contact Data</li> <li>Professional Data</li> <li>Preference Data</li> <li>Digital Asset Usage Data</li> <li>Correspondence</li> </ul>	<p>Legitimate interest (informing our customers about the Digital Asset and our products and services), unless Consent is required by applicable data protection law.</p> <p>You can withdraw this consent/unsubscribe at any time by clicking on the unsubscribe link within each communication.</p>
<p>For legal and regulatory purposes, this includes:</p> <ul style="list-style-type: none"> <li>in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures;</li> <li>to conduct KYC checks, antimoney laundering checks and other due diligence checks;</li> <li>to prevent and detect fraud and/or other criminal activity or misconduct; and/or</li> <li>establishment and handling of legal claims.</li> </ul>	<ul style="list-style-type: none"> <li>Biographical and Contact Data</li> <li>Professional Data</li> <li>Digital Asset Usage Data</li> <li>Correspondence</li> <li>Identification/Know Your Client Data</li> <li>Anti Money Laundering Data</li> <li>Transaction Data</li> </ul>	<p>Legal obligations, where the processing activity is required by law or regulation.</p> <p>In all other cases, legitimate interests (to comply with our obligations and exercise our legal rights).</p>
<p>Processing activity</p>	<p>Information we use</p>	<p>Relevant lawful bases</p>

<p>To receive business support (such as consultancy, banking, legal, insurance and accounting services) or to restructure our business, including in the context of sales, transfers, mergers and acquisitions (and the negotiations of the foregoing).</p>	<ul style="list-style-type: none"> <li>• Biographical and Contact Data</li> <li>• Account Credentials</li> <li>• Professional Data</li> <li>• Preference Data</li> <li>• Digital Asset Usage Data</li> <li>• Correspondence</li> </ul>	<p>Legitimate interest (restructuring our business).</p>
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You may choose not to provide us with your personal information. However, if you choose not to provide your personal information, we may not be able to offer some of our services to you.

### Profiling

We may apply profiles to you based on the personal information set out above. Such profiles may be used to personalize the Digital Asset or services, decide what to advertise to you and/or as part of security threat detection and prevention.

## 5. Information we share

### Intragroup sharing

We may share your personal information with other entities within the bp Group as part of our business operations, including with our parent company bp PLC, headquartered in the United Kingdom.

### Third party service providers

We may share your personal information with third-party service providers such as WhatsApp, agents and contractors to provide services to us (for example, our accountants, professional advisors, and IT and communications providers). We may also share your personal information with our business partners who may use it for their own purposes (as permitted by applicable data protection law), such as for administering and promoting their products/services. Any third-party provider we appoint must protect your personal information in line with the contractually required security measures.

### Social media platforms

We may use your personal information to undertake advertising campaigns on social media platforms such as LinkedIn, Instagram and Facebook in order to provide information about upcoming services or new products and to ensure you only receive relevant advertising about our products and services. We may share your personal information with social media platforms so that you see advertising about our, or our partners', products and services that we think you will be interested in when you interact



with the relevant social media platform. We may also share your personal information with social media platforms to help us present relevant advertising to individuals who the social media platforms determine are likely to have similar interests to you.

## Legal and regulatory disclosures

We may disclose your personal information as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator or any other legal process served to us. We may also share your personal information in connection with legal proceedings. These bodies may be situated outside of your jurisdiction. In these instances, the legal and/or regulatory authority will be considered to be a data controller (not acting on our instructions) and will be primarily responsible for deciding how your personal information is held and used once shared by us.

We may also share your personal information with credit reference agencies and fraud prevention agencies for the purposes of assessing creditworthiness and product suitability, checking your identity, managing your account, and preventing criminal activity.

## Restructuring recipients

We may share your personal information with third parties (and their advisors) to whom we may choose to sell, transfer or merge parts of our business or our assets.

## 6. International transfers

As an international company, we may store or transfer your personal information to other bp Group entities around the world. Where this is the case, we will ensure that the importing jurisdiction offers an adequate level of data protection, or we will provide the personal information under a comprehensive, flexible, and global compliance framework which implements appropriate measures and safeguards to ensure that your personal information is protected in accordance with applicable data protection laws.

Similarly, where we transfer personal information to a third party located in a different jurisdiction, we will ensure that appropriate measures are in place to ensure an adequate level of protection for your personal information, such as by including appropriate clauses in our agreements with third parties.

You can request further information about our international transfers and the contractual safeguards we implement using the contact details below.

## 7. Retention of your information

How long we will hold your personal information will vary based on the purpose for which we are using it. We will need to keep your information for as long as is necessary for each purpose in line with our business needs, as documented in our internal policies. These may vary between jurisdictions. For example, if you are located in the UK and we have a contract with

you, we will typically retain your personal information for 6 years following the termination of that contract, unless litigation is anticipated when we will keep it longer.

We calculate the retention period based on the time the personal information is needed to: (a) fulfill the purposes described in this privacy statement, (b) meet the timelines required or recommended by regulatory authorities, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.

There may be laws or regulations which set a minimum period for which we have to keep your personal information. We will only hold your information for the defined retention period, before anonymizing the information or deleting it. Anonymising personal information means ensuring that the data is no longer identifiable to you personally. We do this either by aggregating the data (for example, to make a finding about a group of people as opposed to a specific individual) or by removing any personal identifiers (for example, contact information) so that we can still use data to identify trends and patterns but cannot link this data back to you.

If you choose to unsubscribe from a service, we may keep a 'suppression list' containing your details so we know you have unsubscribed and to ensure you are not contacted again. Your personal information held on a suppression list will not be used for any other purpose.

## 8. Your Rights

Some or all of the rights set out below will apply to you depending on where you are located. For instance, if you are located in the EEA or the UK, you are afforded all of the rights set out below, and if you are in Australia, you have the right to access and correct your personal information.

### 8.1 Data Protection Rights

- **Access to your personal information.** Where applicable, you are entitled to receive a copy of personal information we hold about you.
- **Correction of the personal information that we hold about you.** You may request that we correct any incomplete or inaccurate data we hold about you, though we may need to verify the accuracy of the new data you provide to us. It is important that the personal information we hold about you is accurate and current. Please contact us using the contact details below to update us in the event of any changes to your personal information.
- **Erasure of your personal information.** You may request that we delete or remove personal information where there is no overriding reason for us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we have processed your information unlawfully or where we are required to erase your personal information to comply our legal obligations.

- **Restriction of processing of your personal information.** You may ask to suspend the processing of your personal information in the following scenarios:
  - If you want us to establish the data's accuracy;
  - Where our use of the data is unlawful but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - You have objected to our use of your information, but we need to verify whether we have overriding legitimate grounds to continue to process it.
- **Transfer of certain of your personal information to you or a third party.** Where this right applies, we will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please note that this right only applies to information you provided to us and which we process on the basis of consent or where it is necessary to perform a contract with you.
- **Withdraw consent where we are relying on consent to process your personal information.** Withdrawal will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. Where we seek consent, it can be withdrawn by a digital consent management tool, or by sending an email to the contact details set out below.

## 8.2 Right to object

Where we process your personal information based on legitimate interests, you have the right to object to such processing, including profiling on grounds relating to your particular situation, at any time.

If you exercise your right to object, we will stop processing your personal information in that context. In some cases, however, we may demonstrate that we have compelling legitimate grounds to continue to process your personal information and if this is the case, we will inform you.

## 8.3 Right to complain to your supervisory authority

We are committed to working with you to obtain a fair resolution of any complaint about our use of your information. If you have any concerns or wish to make a complaint to our privacy teams (including relevant data protection officers), please use the details provided below in the Contact Us section.

You may have the right to complain to a competent supervisory authority, if you are unsure about which authority you may be able to complain to, please contact us using the details below.

Please be aware that all the rights listed above are not absolute and there are situations where they cannot be exercised or are not relevant.

## 9. Contact us

If you have any questions about this statement, our privacy practices or your data protection rights, please contact us (including data protection officers, where relevant) at [privacy3@bp.com](mailto:privacy3@bp.com).

When you contact us, please indicate in which country and/or state you reside. When you exercise your rights, if we cannot easily confirm your identity or if you use a third party to exercise your rights described in this privacy statement.

#### **10. Third party websites we link to**

Our Digital Assets may contain links to external websites, services or content provided by third parties, which are outside of our control and are not covered by this statement. Interacting with this external content may allow third parties to collect or share information about you. The privacy practices of these third parties are governed by their own privacy statements. We encourage you to read these third party's terms, to better understand their privacy practices.

#### **11. Changes to this privacy statement**

This statement was last updated on 2/2/2023. We will update it again when necessary to reflect changes in the law and our practices. If we make a material change to this privacy statement, you will be provided with appropriate e-mail notice in accordance with legal requirements.

We encourage you to periodically review this statement to stay informed about our collection, processing and sharing of your personal information.