

# BA Continuum India Private Limited

## Privacy Statement

### Our privacy commitment:

- Protect personal information
- Inform on use of personal information
- Offer choices on the use of personal information and honour choices
- Collect, use and process personal information respectfully and lawfully

This document includes information about how BA Continuum India Private Limited manages personal information:

1. Our security commitment
2. What personal information we collect, use and process
3. Purposes for which we use personal information
4. Sharing personal information
5. Transfers of personal information to other countries
6. Data integrity and retention
7. Honouring choices
8. Enquiries

BA Continuum India Private Limited recognises the importance of protecting personal information in compliance with applicable legal and regulatory requirements. We have policies and practices in place to ensure compliance with the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules 2011 ("Information Security Rules 2011").

### **1. Our security commitment**

Keeping personal information secure is one of our most important responsibilities. We maintain physical, technical, electronic, procedural and organisational safeguards and security measures to protect personal information against accidental, unlawful, or unauthorised destruction, loss, alteration, disclosure, or access, whether it is processed by us in India or elsewhere. Appropriate employees are authorised to access personal information for legitimate and specified business purposes. Our employees are bound by a code of ethics and other internal policies that require confidential treatment of personal information and are subject to disciplinary action if they fail to follow such requirements.

More information on our security practices and procedures is set out in our [Global Information Security Policy](#).

### **2. Personal information we collect, use and process**

We collect, use and process various types of personal information, including but not limited to name, address, email address, telephone number, date of birth, personal identifiers such as passport number, Permanent Account Number, driver licence, other personally identifiable information, and sensitive personal data or information as defined in the Information Security Rules 2011.

When individuals communicate with BA Continuum India Private Limited, to the extent permitted or required by applicable law, telephone conversations and electronic communications, including emails, text messages and instant messages, may be recorded and/or monitored for evidentiary, compliance, quality assurance and governance purposes.

### **3. Purposes for which we use personal information**

3.1 We collect, use and process personal information about individuals in the course of our employment relationship with our employees. We may collect, use and process such personal information for a range of purposes as set out in the [Employee Data Protection Notice in place for BA Continuum India Private Limited \(BACI\)](#). For more information on employee privacy, employees should contact Global Human Resources.

3.2 We collect, use and process personal information about individuals in the course of our dealings with service-providers who provide services to us. We may collect, use and process such personal information for a range of purposes, which may include but is not limited to:

- to verify identity
- to respond to enquiries or requests
- to provide security for individuals visiting our premises, our employees and the general public
- to detect, prevent and investigate fraud
- to comply with applicable laws, rules and regulations
- to comply with legal process, to respond to requests from public, regulatory or government authorities (including authorities outside India), and to allow us to pursue remedies and limit damages
- to perform internal business processes such as data analysis, audits, etc

3.3 We process personal information about individuals in the course of providing services to Bank of America Corporation companies for the relevant purposes of such companies. Bank of America Corporation companies around the world may collect, use and process personal information for a range of purposes, which may include but is not limited to:

- to provide clients with products and services
- to facilitate transactions
- to provide clients with advice and guidance
- to service, maintain or collect on accounts

- to respond to client requests
- to detect, prevent and investigate fraud
- to provide security for clients, employees and the general public
- to verify identity
- to perform risk management
- to comply with applicable laws, rules and regulations, including anti-terrorism, anti-money laundering, anti-bribery, anti-corruption and tax reporting rules and regulations
- to comply with legal process, to respond to requests from public, regulatory or government authorities (including authorities outside India), and to pursue remedies and limit damages
- to perform internal business processes such as data analysis, audits, developing and improving new products and services

#### **4. Sharing personal information**

##### **Sharing personal information with our affiliates**

Bank of America Corporation companies around the world share personal information with each other for all of the purposes described in this document. All Bank of America affiliates are committed to protecting personal information and to using it only for legitimate purposes.

##### **Sharing personal information with service providers**

Bank of America Corporation companies around the world may share personal information with service providers that work for us in any of the countries in which we operate. We supervise our service providers and require them to appropriately protect personal information. Service providers may include:

- customer service, payment or transaction processing companies
- printing companies
- order fulfillment, market research, surveying, or professional services organisations (such as legal, audit, accounting services, technology, and data processing companies)
- technology hosting (such as webhosting, cloud computing, infrastructure provision, application service providers, data centre services and technology service providers)

##### **Sharing personal information with other third parties**

Bank of America Corporation companies around the world may also share personal information with other third parties. These third parties may include public, regulatory and government authorities, intermediaries, other nonaffiliated third parties as requested, self-regulatory organisations, or judicial or law enforcement authorities.

In addition to the above purposes, personal information may be shared for the following purposes:

- to perform credit checks
- to provide credit references (when requested)
- to trace debtors
- as part of the sale, merger or similar change of a Bank of America Corporation business

#### **5. Transfers of personal information to other countries**

Due to the global nature of the Bank of America Corporation, personal information may be transferred around the world to countries in which Bank of America Corporation companies do business, including to affiliates, service providers or third parties, which may be located in jurisdictions that may not have the same data protection laws as those in India. Bank of America Corporation companies are responsible for making sure that personal information continues to be protected by affiliates and service providers in other countries.

#### **6. Data integrity and retention**

We process personal information in a manner that is adequate, relevant and not excessive in relation to the purposes for which it is collected or further processed. We endeavour to keep personal information for only so long as is necessary for the purposes for which it was collected, to meet legal and regulatory requirements, and in keeping with the period required or permitted by law.

#### **7. Honouring choices**

Individuals have the right to not provide (or to withdraw by written notice at any time) consent to the collection, use, processing and sharing of personal information.

Individuals have the right to request to review personal information that they have provided and to request correction or amendment of such personal information if it is inaccurate or incomplete, where feasible.

#### **8. Enquiries**

For any questions regarding the collection, use, processing and sharing of personal information (including specific details of entities with which we share personal information), please contact the Grievance Officer for BA Continuum India Private Limited:

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