

PRIVACY POLICY

This Privacy Policy explains how we at Bharat Petroleum Corporation Limited (hereinafter referred to as BPCL, “we,” “us,” or “our”, including our affiliates and group companies) collect, use, share and process your information, that you provide to us through your use of our website – <https://ebharatgas.com>, <https://ebiz.bpc.co.in>, <https://eparichay.bpcl.in>, <https://eConnect.bpcl.in> (“BPCL Platforms”) either directly or through our authorised distributor(s), in the course of providing services to you.

1. SERVICES

Through the BPCL Platforms, we provide you with the following services (“Services”):

- a) Providing a platform for registering request for new domestic gas connection either by yourself or through a distributor;
- b) Providing a platform for raising request for refills, lodging service complaints, managing billing, invoice and payment related information, raising maintenance services requests, etc.;
- c) Providing value added products and services, such as:
 - eKyc for consumers.
 - Self-Services options for maintaining and updating user profile.

2. WHAT IS PERSONAL INFORMATION?

Personal Information refers to any information that can identify you, directly or in combination with other information (such as de-identified data that, when linked to other information available to us, would enable us to identify you). However, it does not include any data that has been irreversibly anonymized or aggregated which makes us unable to identify you through it, even in conjunction with other information. Sensitive personal data or information refers to the category of Personal Information that is more sensitive in nature and includes passwords, financial information, sexual orientation, biometric, etc.

By using the BPCL Platforms/availing any of the Services, you represent that you voluntarily provide us with Personal Information including financial information, and consent to their collection, use and disclosure in accordance with this Privacy Policy. You also represent that you are duly authorised by any third party whose information you may share with us.

3. HOW IS PERSONAL INFORMATION COLLECTED?

Your information may be collected by us through all or any of following methods:

- a) Self-registration by you on the BPCL Platforms;
- b) Registration on the BPCL Platforms with the help of the BPCL’s team, dealer/distributors or their employees;
- c) Migration of data available across various existing BPCL platforms;
- d) Your interaction with BPCL on channels like social media, IVRS, integrated third party messaging applications or other mobile applications / APIs (for e.g., Umang app), etc.;
- e) Your purchase transactions at various BPCL outlets; and

- f) Enrolment under various schemes announced by Government of India or BPCL from time to time.

4. TYPES OF PERSONAL INFORMATION COLLECTED

The types of information that will be collected by us includes:

- a) Name and demographic data;
- b) Email ID/ Mobile Number;
- c) Business/ firm-related details, including registration documents;
- d) Mandatory KYC-related information and documents, including encrypted Aadhaar token, Aadhaar number, PAN, etc.
- e) Financial information such as payment details, bank account details, etc.
- f) Details of subsidy availed by you as a BPCL customer, and historical consumption data;
- g) Details pertaining to loan and advances availed for the connection and details pertaining to refill booking etc.
- h) Internet protocol (IP) addresses, domain name, browser type, the date and time of the visit and the pages visited, in certain cases such as for refill booking;
- i) Records of purchase transactions;
- j) Feedback about BPCL services;
- k) Information shared with BPCL in case of registration through other channels, for example, social media platforms;
- l) Chat/ interaction history with BPCL (through chat bot, integrated third party messaging applications, other helpline sources, etc.); and
- m) Any other information that you voluntarily choose to provide to us.

5. PURPOSE OF COLLECTION AND USE OF PERSONAL INFORMATION

All the information provided by you to us, including Personal Information or specific categories of Personal Information, is on a voluntary basis. When you provide us with your Personal Information, it is implied that you consent to our collecting the information and using it for the purposes mentioned in this policy.

We use your Personal Information for purposes which include the following:

- a) Your registration for the purpose of creating an account to receive our Services;
- b) Processing any orders you may place using our Services;
- c) For sharing limited information with third party strategic partners in order to offer value added services;
- d) Enable you to make payments in the easiest and shortest possible way (for example, by preferred mode of payment, through saved card details, auto-debit from saved payment details etc.);

- e) To run data analytics for internal purposes such as deriving customer-specific/anonymous insights on consumer behaviour, improvement of products and services, developing new solutions, etc.
- f) To address requests, queries and complaints, if any, pertaining to our Services and for enhanced customer services and quick resolution;
- g) To contact you to provide new services or products offered by us, receive feedback, and assist you with completion of transactions or other issues relating to the Services availed by you,
- h) To process subsidy transfer for LPG, using Aadhaar based payment mechanism or as per bank account details provided by you.

The BPCL Platforms use temporary cookies to store certain (that is not sensitive personal data or information) that is used by us and our service providers for the technical administration of the BPCL Platforms, research and development, and for user administration. In the course of serving advertisements or optimizing services to you, we may allow authorized third parties to place or recognize a unique cookie on your browser. The cookies however, do not store any Personal Information that belongs to you. You may disable cookies at your discretion. However, if you block all cookies (including essential cookies), you may not be able to access all or parts of the BPCL Platforms or you may face reduced functionality when accessing certain features of the BPCL Platforms.

6. DISCLOSURE AND TRANSFER OF PERSONAL INFORMATION

We disclose and, in some cases, transfer your Personal Information to such entities as required to provide Services to you. These entities may be located outside India. You hereby consent to such transfer and/or disclosure. We require such entities to protect your information through equivalent security measures as what we would adopt. An indicative list of the entities to whom we may disclose or transfer information is provided below.

- a) **Within BPCL:** We may share Personal Information with our employees, agents, officers, group companies and employees, agents and officers of such group companies and our affiliates (including affiliated websites under common ownership or control) for the purpose of processing Personal Information on our behalf.
- b) **Third Party Service Providers:** We sometimes share limited Personal Information such as name, mobile number, Aadhaar number, bank account details etc. with third party strategic partners. We share your details with the Unique Identification Authority of India (“UIDAI”) and the National Payments Corporation India (“NPCI”) for Aadhaar and bank mandate validation.
- c) **Technical Services:** We also share certain personal data with companies that provide other Services on our behalf, such as website hosting, data storage, software services, email services, SMS services, marketing, fulfilling customer orders, providing payment services, data analytics, providing customer services, and conducting surveys. These companies, irrespective of their location, are obligated to protect your data.
- d) **Direct Benefit Transfer by Government Agencies:** Your Personal Information such as Aadhaar number and bank account details are shared with partners such as State Bank of India (“SBI”)/ National Payment Corporation of India (“NPCI”) / Public Finance Management System (“PFMS”) to enable cash transfer of advance/ LPG subsidy transfer to you. Your Personal Information may also be shared with Oil Marketing Entities and / or the National Informatics

Centre (“**NIC**”) for the purposes of de-duplication and to avoid multiple connections. We also share your data with state offices of the NIC and Petroleum Planning and Analysis Cell (“**PPAC**”) for lodging claims under various financial schemes launched by State Governments.

- e) **Law Enforcement Agencies:** We may share information with regulatory or law enforcement agencies pursuant to lawful requests for information, and otherwise as required under any law applicable at the given time. We may also disclose your Personal Information to unaffiliated third parties if we believe in good faith that such disclosure is necessary to provide you and other users of the BPCL Platforms with the Services or products requested by you and/or the other users, and to perform other activities related to such Services and products, including billing and collection and to provide you with special offers or promotions from BPCL that may be of interest to you, or to operate BPCL’s systems properly. This will include sharing any Personal Information as may be necessary with various departments / offices within the Central Government and State Government (such as the Ministry of Petroleum and Natural Gas).
- f) **Others:** We may also disclose personal data if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.

7. AADHAAR DATA PRIVACY AND SECURITY

BPCL has been appointed to operate as a Authentication User Agency (“**AUA**”) for the purposes of the Aadhaar (Targeted Delivery of Financial and Subsidies, Benefits and Services) Act, 2016 (“**Aadhaar Act**”) and can provide access to Aadhaar based services such as the Aadhaar e-KYC and may appoint Sub-Authentication User Agency (“**Sub-AUA**”) services as contemplated by the UIDAI from time to time.

- a) **User Consent:** You will have the option to provide your Aadhaar number or virtual ID for availing the services by BPCL. If you opt to avail such Services, you agree to provide your Aadhaar number to BPCL as an AUA or its Sub-AUA (as may be applicable) for the purposes identified hereunder and subject to the terms of the Aadhaar Act and applicable Regulations, circulars, etc.
- b) **Aadhaar Authentication Services:** You acknowledge that BPCL as an AUA or its designated third party Sub-AUA shall use the authentication services provided by UIDAI to verify your Personal Information against the information stored in the UIDAI’s Central Identity Data Repository in order to provide Aadhaar enabled Services to you.
- c) **Compliance:** As an AUA, BPCL shall undertake all measures which include security safeguard measures to ensure that Aadhaar related information that is in the possession and control of BPCL (as the AUA) and/ or its Sub-AUA (if applicable) is secured and protected against any loss, unauthorised access or unauthorised disclosure including all obligations relating to protection of information in accordance with the Aadhaar Act and other applicable regulations, as amended.

8. USER RIGHTS

We take reasonable steps to ensure that your Personal Information is accurate, complete, and up to date. However, you have the responsibility of ensuring that you review the accuracy of information provided by you and contact us in case of discrepancies, or in case you wish to discontinue the use of our Services. You have the following rights with regard to your Personal Information:

a) Access to Data:

You have the right to access your Personal Information, and request review, correction and deletion. BPCL Platforms, on the website [ebharatgas.com], provides for a feature to update your information through the 'Self-KYC' option wherein you can update your records by providing the required documents.

b) Withdrawal of Consent:

You are free to not share any Personal Information that you consider confidential, and withdraw consent for us to use data that you have already provided. In the event that you refuse to share any information, or withdraw consent to process information that you have previously given to us, we reserve the right to restrict or deny the provision of our Services for which we consider such information to be necessary.

c) Grievance Redressal:

BPCL shall have two grievance officer systems. One for general complaints and second will be a grievance mechanism where complaints regarding Aadhaar authentication mechanism can be addressed. You may please write to customercare@bharatpetroleum.in to lodge general complaint regarding your Personal information, or to review and address any discrepancies or grievances you may have with respect to your Personal Information as available with BPCL on account of your use of the BPCL Platforms.

For any matters related to Aadhaar specific information, please contact [Mr. Milind Tirpude tirpudems@bharatpetroleum.in], including for complaints pertaining to Aadhaar authentication. Alternatively, please reach out to our Customer Relationship Centre at 1800 224 344, to lodge any complaint pertaining to your use of the BPCL Platforms, including for any matters connected with your Aadhaar details.

BPCL will endeavor to respond to your request within a reasonable time.

9. INFORMATION RETENTION POLICY

We store your Personal Information in accordance with applicable laws, which means that we keep your Personal Information for as long as necessary to provide you with our services or as may be required under any law. We shall store your Personal Information for lawful purposes only. We may also keep de-identified data for research and statistical purposes for a longer period, subject to applicable legal requirements.

If you close your account, we may have to retain the data if we believe it may be necessary to prevent fraud or future abuse, or if required by law, or for other legitimate purposes.

10. CONFIDENTIALITY & INFORMATION SECURITY POLICY

We use reasonable technical, administrative, and physical security measures for the purpose of safeguarding all data you share with us, and have internal policies in place to prevent unauthorized access to your data. For example, credit/debit card details are stored in a secure way by using the Payment Card Industry Data Security Standard (PCI DSS) and Aadhaar Data Vault is used to safeguard Aadhaar number and related data. We also take adequate steps to ensure that third parties with whom we may share data, also adopt reasonable level of security practices and procedures to ensure the privacy and security of your Personal Information.

No administrator at our end will have knowledge of your password. It is important for you to protect against unauthorized access to your password, your computer and your mobile phone. Be sure to log off from the BPCL Platforms when finished. We do not undertake any liability for any unauthorised use of your account and password. If you suspect any unauthorized use of your account, you must immediately notify us by sending an email to customercare@bharatpetroleum.in. You shall be liable to indemnify us due to any loss suffered by us due to such unauthorized use of your account and password.

However, we are not responsible for any loss, unauthorised access, safety issue or any harm caused to you by any misuse of your Personal Information, unless it is a direct and foreseeable consequence of negligence and non-compliance on our part only. We are not responsible for the confidentiality, security or distribution of your Personal Information by our partners and third parties outside the scope of our agreement with such partners and third parties. 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, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of Internet service or telephone service on your part. You hereby acknowledge that we are not responsible, in particular, for any third party action or action on your part leading to loss, damage or harm to you or any other person.

11. THIRD PARTY WEBSITES AND SERVICES

The BPCL Platforms may contain links to third party services, and give you the ability to access such third party websites, products, and services. We are not responsible for the privacy practices employed by those third parties or in the case of registration for our Services through third party platforms, nor are we responsible for the information or content their products and services contain. Please read the privacy policies of any third party before proceeding to use their websites, products, or services.

12. DISTRIBUTOR'S RESPONSIBILITIES

The distributor shall be responsible for updating information on the portal [<https://econnect.bpcl.in>] on behalf of you. Hence the distributor shall be responsible for the following things:

- a) At the time of collecting Personal Information, the distributor shall identify the purposes for which information is being collected and notify the same to you.
- b) The distributor shall collect and use of Personal Information solely with the objective of fulfilling those purposes as specified in Section 4 of this policy.

- c) The distributor shall retain Personal Information as long as necessary to complete updating such information on portal and creating your user profile within BPCL's system.
- d) The distributor shall retain Personal Information for lawful purposes with your knowledge and consent.
- e) Personal Information should be relevant to the purposes for which it is to be used as specified in Section 4 and, to the extent necessary for those purposes, should be accurate, complete, and up-to-date.
- f) The distributor shall protect Personal Information by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

13. MODIFICATIONS/UPDATES TO PRIVACY POLICY *

As there may be new versions of the BPCL Platforms released from time to time, modifications/updates may be effected to this Privacy Policy, or even for other reasons. We reserve the right to make changes to the Privacy Policy at any time, and we would request you to periodically review the Privacy Policy. Please note that your continued use of the BPCL Platforms will be construed as your providing consent and acceptance of any modifications to the Privacy Policy. If you do not agree with any such revised terms, please refrain from using our products or services and contact us to close any account you may have created.

***Privacy Policy last updated on [07-Oct-2023]**