



# Data Privacy Policy

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## 1 Personal Data Protection Policy

### 1.1 Objective

This policy intends to protect personal information of CTL employees, customers, business partners and other identifiable individuals.

### 1.2 Policy

Appropriate protection measures shall be implemented to protect privacy of CTL employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates for employment.

CTL shall adhere to:

#### 1.2.1 Notice

When collecting Personal Information directly from individuals, CTL strives to provide clear and appropriate notice about:

- Purposes for which it collects and uses their Personal Information,
- Types of non-Agent third parties to which CTL may disclose that information
- Choices and means, if any (e.g. deletion of records, sharing of records, coping of data, , etc)
- CTL policy of limiting the use and disclosure of Personal Information collected.

#### 1.2.2 Choice

CTL shall offer a choice to individuals regarding how Personal Information is processed, including the opportunity to choose to opt-out of further Processing or, in certain circumstances, to opt-in. However, explicit consent from individuals is not required when Processing Personal Information for purposes consistent with the purpose, for which it was originally collected or subsequently authorized by the individual,

- Purposes necessary to carry out a transaction relationship,
- Purposes necessary to comply with legal requirements, or
- Disclosure to an third party agent



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### 1.2.3 Accountability

Accountability for Onward Transfer, In regard to the transfer of Personal Information to an Agent or Controller, CTL shall take reasonable and appropriate steps to:

- Transfer collected Personal Information only for specified purposes and limit the Agent or Controller's use of that information for those specified purposes,
- Obligate the Agent or Controller to provide at least the same level of privacy protection as is required by this Policy,
- Help ensure that the Agent or Controller effectively Processes the Personal Information in a manner consistent with its obligations under this Policy,
- Require the Agent or Controller to notify CTL if the Agent or Controller determines it can no longer meet its obligation to provide the same level of protection as is required by this Policy, and upon notice from the Agent or Controller, take further steps to help stop and remediate any unauthorized Processing.

### 1.2.4 Security

CTL shall take reasonable and appropriate measures to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the Processing and the nature of the Personal Information. This may include measures like data masking, encryption

### 1.2.5 Data Integrity and Purpose Limitation

CTL shall only Process Personal Information in a way that is compatible with the purpose for which it has been collected or subsequently authorized by the individual. CTL shall take steps to help ensure that Personal Information is accurate, reliable, current and relevant to its intended use. (e.g. Data masking, encryption)

### 1.2.6 Access



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CTL provides individuals with reasonable access to their Personal Information for purposes of correcting, amending or deleting that information where it is inaccurate or has been processed in violation of the CTL data privacy principles.

### 1.2.7 Recourse, Enforcement and Liability

Violation of this Policy by an employee or contractor of CTL shall result in appropriate discipline up to and including termination. Violation by an Agent, Controller or other third party of this Policy or CTL privacy requirements will result in the exercise of appropriate legal remedies available at law or in equity including termination for material breach of contract.

### 1.2.8 Purpose of Collecting and Use of Personal Information

- CTL may from time to time process certain Personal Information from or about employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates for employment, including information recorded on various media as well as electronic data.
- CTL will use that Personal Information to provide customers, business partners, vendors, service partners and suppliers with information and services and to help CTL personnel better understand the needs and interests of these customers, business partners, vendors, service partners and suppliers. Specifically, CTL uses information to help complete a transaction or order, to facilitate communication, to market and sell products and services, to deliver products/services, to bill for purchased products/services, and to provide ongoing service and support. Occasionally CTL personnel may use Personal Information to contact customers, business partners, vendors, service partners and suppliers to complete surveys that are used for marketing and quality assurance purposes.
- CTL may also share Personal Information with its business partners, vendors, service providers and suppliers to the extent needed to support the customers' business needs. Suppliers are required to keep confidential Personal Information received from CTL and shall not use it for any purpose other than as originally intended or subsequently authorized or permitted.

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- CTL also collects Human Resources Data in connection with administration of its Human Resources programs and functions and for the purpose of communicating with its employees. These programs and functions may include compensation and benefit programs, employee development planning and review, performance appraisals, training, business travel expense and tuition reimbursement, identification cards, access to CTL facilities and computer networks, employee profiles, internal employee directories, Human Resource record keeping, and other employment related purposes.
- CTL also collects and uses Personal Information to consider candidates for employment opportunities within CTL. Human Resources Data may be shared with third party vendors and service providers for the purpose of enabling the vendor or service provider to provide service and/or support to CTL in connection with these Human Resources programs and functions. CTL will not share Human Resources Data with third parties for non-employment related purposes. CTL requires third parties receiving Personal Information to apply the same level of privacy protection as contained in this Policy and as required by applicable law.

### 1.2.9 Administration

Responsibility for compliance with this Policy rests with the heads of the individual functions, business units and departments together with any individual employees collecting, using or otherwise Processing Personal Information. Business unit, function and department heads, in coordination with the Legal Department, are responsible for implementing further standards, guidelines and procedures that uphold this Policy, and for assigning day-to-day responsibilities for privacy protection to specific personnel for enforcement and monitoring.

### 1.2.10 Implementation

Wherever applicable, this Policy is meant to be implemented in conjunction with supplementary data privacy policies specific to a region, country or department. These supplementary data privacy policies will account for differences in data protection requirements by jurisdiction or function and will specify individual roles and responsibilities. CTL business units,

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functions or facilities will implement supplementary data privacy policies as required to be in compliance with applicable laws.

### 1.2.11 Interpretation

In the event of any conflict between this Policy and any supplemental data privacy policy, this Policy will supersede the supplemental data privacy policy to the extent that the supplemental data privacy policy is less restrictive. Local data privacy policies may provide for stricter data privacy and protection standards than are set forth in this Policy. In the event local data privacy law provides for stricter data privacy and protection than this Policy, the local data privacy law will supersede this Policy in that jurisdiction to the extent necessary to comply with stricter local law.

### 1.2.12 Definitions

- Agent - means any third party that collects and/or uses Personal Information provided by CTL to perform tasks on behalf of and under the instructions of CTL.
- CTL and all of its subsidiaries and affiliates globally.
- Controller - means a person or organization which, alone or jointly with others, determines the purposes and means of the Processing of Personal Information.
- Human Resource Data - means Personal information concerning CTL employees or prospective employees.
- An “Identified” or “Identifiable” individual - is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person’s physical, physiological, mental, economic, cultural or social identity.