
PRIVACY POLICY

TABLE OF CONTENTS

1. Introduction
2. Principles and important information
 - 2.1. Purpose of this privacy notice
 - 2.2. Data Fiduciary
 - 2.3. Changes to the privacy notice and your duty to inform us of changes
 - 2.4. Third-party links
3. The data we collect
 - 3.1. If you fail to provide personal data
4. How is your personal data collected?
 - 4.1. How we use your personal data
 - 4.2. Purposes for which we will use your personal data
5. Marketing
 - 5.1. Promotional offers from us
 - 5.2. Third-party Marketing
 - 5.3. Opting out
 - 5.4. Cookies
 - 5.5. Change of purpose
6. Disclosures of your personal data
7. International Transfers
8. Data security
9. Data retention
10. Your legal rights
 - 10.1. Right to Grievance Redressal
 - 10.2. Right to Nominate
 - 10.3. Time limit to respond
11. Glossary

1. INTRODUCTION

Avery India Limited (the “Company” or "Data Fiduciary") respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about

your privacy rights and how the Digital Personal Data Protection Act, 2023 ("DPDP Act") protects you.

Please use the Glossary at clause 11.0 for clarity on the meaning of some terms used in this privacy notice.

2. PRINCIPLES AND IMPORTANT INFORMATION

2.1 Purpose of this privacy notice

This privacy notice aims to give you information on how the Company collects and processes your personal data (including "Digital Personal Data") through your use of our website, including any data you may provide through this website when you sign up for usage and/or purchase a product or service.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

2.2 Data Fiduciary

The Company is made up of different legal entities, and this Privacy Notice is issued on behalf of Avery India Limited (the Company). The company is a 'Data Fiduciary' and gathers and uses certain information about you. This information is also used by our affiliated entities and group companies, namely ITW India Private Limited, ITW Inc., AWTX, GSE, Salter, Brecknell, Dillon, Railweight, Central Weighing and/or Exactrak, along with any future subsidiaries or affiliated entities (our 'group companies') and so, in this policy, references to 'we' or 'us' or 'our' mean the Company and/or our group companies.

The Company is a Data Fiduciary and responsible for our associate website/s.

We have appointed a Data Protection Officer / Grievance Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer / Grievance Officer at dataprotection@awtx-itw.com.

You have the right to make a complaint at any time to the Data Protection Board of India. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Board so please contact us in the first instance at dataprotection@awtx-itw.com.

2.3 Changes to the privacy notice and your duty to inform us of changes

This version is dated on the cover of this notice. Historic versions of our privacy notice will be archived and can be obtained by contacting us directly. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2.4 Third-party links

Our website/s may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website/s, we encourage you to read the privacy notice of every website you visit.

3. THE DATA WE COLLECT

Personal data, or personal information, means any information about an individual (the "Data Principal") from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, 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 this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of

users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Sensitive Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, information about your health and genetic and biometric data) unless you explicitly consent to the same for a lawful purpose.

3.1 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract or agreement we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct Interactions

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, telephone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- Automated technologies or interactions

As you interact with our website/s, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please refer to the Cookie Policy on our website for further details.

- Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties;
- analytics providers based inside OR outside the India;
- advertising networks based inside OR outside India; and
- search information providers based inside OR outside India.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside OR outside India.
- Identity and Contact Data from data brokers or aggregators based inside OR outside India.
- Identity and Contact Data from publicly available sources based inside India.

4.1 How we use your personal data

We will only use your personal data when the law allows us to. Under the DPDP Act, we process data based on:

- Consent: Where you have given your free, specific, informed, unconditional, and unambiguous consent.
- Legitimate Uses: For specified purposes such as employment purposes, responding to medical emergencies, or fulfilling legal obligations.

Generally, we rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent at any time by contacting us at dataprotection@awtx-itw.com.

4.2 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at dataprotection@awtx-itw.com if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below:

Purpose/Activity	Type of data	Lawful basis for processing (Consent or Legitimate Uses)
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you

Avery Weigh-Tronix

An ITW Company
 Registered & Head Office
 Avery India Limited
 Plot No. 50-59, Sector-25, Ballabgarh-121004 (Haryana)
 CIN: U29196HR1947PLC043478

Tel: +91-129 4094400
 Fax: +91 129 4094591
 Service Hotline No: +91 8800394041
<https://www.averyweigh-tronix.com/en-in/>
averysales@awtx-itw.com

Privacy Policy: Ver 1.0
 Date: Feb 2026

To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal Obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services	(a) Identity (b) Contact (c) Technical (d) Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)

that may be of interest to you		
--------------------------------	--	--

5. MARKETING

5.1 Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us only if you have explicitly consented to receiving such information through a clear affirmative action (such as opting in via our website forms). You have the right to withdraw this consent at any time.

5.2 Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Avery Weigh-Tronix group of companies for marketing purposes.

5.3 Opting out

You can withdraw your consent for marketing messages or communications at any time by clicking on our 'unsubscribe' or 'opt-out' links on any marketing message/s sent to you. Alternatively, you can withdraw consent directly or by contacting us using dataprotection@awtx-itw.com at any time. Upon withdrawal of consent, we shall cease processing your data for marketing purposes within a reasonable time.

Where you withdraw consent of receiving these marketing messages or materials, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions etc. For further details, please refer to clause 4.2.

5.4 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see the information available on our website i.e. our Cookie Policy Notice.

5.5 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at dataprotection@awtx-itw.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will seek your fresh consent. Please refer to clause 5.3 for full details on withdrawing consent.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by the DPDP Act (e.g. for Legitimate Uses).

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in clause 4.2 of this policy, above

- Internal Third Parties as set out in the Glossary, clause 11.0.
- External Third Parties as set out in the Glossary, clause 11.0.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the DPDP Act. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions under a valid Data Processor Agreement.

7. INTERNATIONAL TRANSFERS

If we need to share your personal data within the ITW limited or Avery Weigh Tronix Group, this will involve transferring your data outside India.

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. Some of our external third parties may be based outside India so their processing of your personal data may involve a transfer of data outside India.

Whenever we transfer your personal data out of India, we ensure a similar degree of protection is afforded to it by ensuring that we do not transfer your data to any country explicitly restricted by the Central Government of India.

Please contact us at dataprotection@awtx-itw.com if you want further information on the specific mechanism used by us when transferring your personal data out of India.

8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the Data Protection Board of India of a breach where we are legally required to do so.

9. DATA RETENTION

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. To determine the appropriate retention period for personal data, we consider:

- the amount, nature, and sensitivity of the personal data;
- the potential risk of harm from unauthorised use or disclosure of your personal data;
- the purposes for which we process your personal data and whether we can achieve those purposes through other means, and;
- the applicable legal requirements.

By law, we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for eight years after they cease being customers for tax purposes (as per the Companies Act and Income Tax Act).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under the DPDP Act in relation to your personal data. These are as follows (As a Data Principal, you have the right to):

- **Right to Access (Information):** Request a summary of your personal data and the identities of all other Data Fiduciaries and Data Processors with whom we have shared your data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right to Correction and Erasure:** Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. You may also request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Right to Withdraw Consent:** Withdraw consent at any time where we are relying on consent to process your personal data. However, this 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.

If you wish to exercise any of the rights set out above, please contact us at dataprotection@awtx-itw.com.

10.1 Right to Grievance Redressal

You have the right to readily available means of grievance redressal regarding the performance of our obligations. If you wish to exercise this right, please contact us at dataprotection@awtx-itw.com.

10.2 Right to Nominate

You have the right to nominate any other individual who shall, in the event of your death or incapacity, exercise your rights.

10.3 Verifying Identity & Time Limit

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within a reasonable period as prescribed by the Data Protection Board. Occasionally it may take us longer than usual if your request is particularly

complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. GLOSSARY

LAWFUL BASIS

Legitimate Uses means the uses of data specified under Section 7 of the DPDP Act (e.g., voluntary provision, employment, medical emergencies).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to (including Indian Laws).

Data Principal means the individual to whom the personal data relates.

Data Fiduciary means any person who alone or in conjunction with other persons determines the purpose and means of processing of personal data.

THIRD PARTIES

Internal Third Parties means any other companies within the ITW limited or Avery Weigh-Tronix Group acting as Data Fiduciaries or Data Processors.

External Third Parties may mean:

- Service providers and/or contractors (acting as Data Processors) who provide services on behalf of ITW limited or the Avery Weigh-Tronix group.
- Professional advisors (acting as Data Processors or Joint Fiduciaries) including lawyers, bankers, auditors and insurers based who provide consultancy, banking, legal, insurance or accounting services etc.
- Indian Tax Authorities, regulators and other authorities (acting as Data Fiduciaries) who require reporting of processing activities in certain circumstances.
- Any other external body, contact or agent required to work in partnership with the company by law or legislation.