

1. Introduction

- 1.1. PERSOLKELLY India Private Limited (the “**Company**”, “**we**”, “**us**”, or “**our**”) respects the privacy of individuals (“**you**”, “**your**” or “**individuals**”) and we acknowledge that you have certain rights related to any personal data that we collect from you in oral, digital or written form, and we have certain obligations in respect of the same. The Company supports the various international and local privacy laws and has procedures in place to meet the requirements of those laws.
- 1.2. This data privacy policy and consent notice (“**Privacy Policy**”) discloses our privacy principles and/or our practices for our operations in India, for gathering, collecting, organizing, indexing, altering, adapting, processing, recording, storing, retrieving, sharing, disclosing, using, erasing, restricting and/or destructing your personal data, either directly, indirectly, or in combination with any other information available or likely to be available with us. We encourage you to review this Privacy Policy so that you may understand how we may collect, use, store, disclose, process, and share your personal data. Please note that in certain circumstances, the processing of personal data can also include wholly or partly automated operations or a set of operations on personal data, without human intervention.
- 1.3. For the avoidance of doubt, “**data**” means a representation of information, facts, concepts, opinions, or instructions in a manner suitable for communication, interpretation, or processing by human beings or by automated means; and “**personal data**” means data about an individual who is identifiable by or in relation to such data.
- 1.4. This Privacy Policy must be read and understood as a notice given by the Company to inform the individuals about (a) the description, purpose and manner for which your personal data is collected and processed, and (b) the manner in which you can exercise your rights in relation to your personal data provided to us, including the grievance redressal mechanisms available to you and the manner in which you can file complaints with the relevant authorities including the Data Protection Board of India. Please note that this Privacy Policy constitutes consent notice for (a) the personal data provided to the Company in the past, and (b) the personal data being shared or intended to be shared with the Company. You have an option to access this Privacy Policy in either English or in the languages listed in the Indian Constitution’s eighth schedule. You may contact our consent manager if you would like to request for this Privacy Policy in other languages listed in the Indian Constitution’s eighth schedule.
- 1.5. Further, please note that subject to and in accordance with local applicable laws, certain rights to personal data providers under this Privacy Policy may (a) only be available in the context of digital personal data or personal data that is provided in a non-digital form and subsequently digitised, and (b) not apply in case of personal data that is publicly available. In case you wish

to understand your extent of rights, please write to our consent manager. For the purposes of your understanding, a consent manager means a person designated by the Company to act as a single point of contact for individuals to give, manage, review, and withdraw their consent provided for the processing of personal data.

- 1.6. This Privacy Policy is intended as a consent notice for individuals above 18 (eighteen) years of age and who are not subject to any legal or other disabilities. In case you are an individual below 18 (eighteen) years of age or subject to any disability, we request that your parents / legal guardian, as the case may be, contact our consent manager for obtaining a copy of this Privacy Policy and providing requisite consents for processing of your personal data in accordance with applicable laws. We also require that you cease using our services which involve collection and processing of your personal data, until we procure requisite consents from your parents / legal guardians for such collection and processing of your personal data, in accordance with applicable laws. Please note that we will not be responsible, in any manner whatsoever, for any liability arising from your actions in contravention of our requirements stated in this paragraph 1.6 of the Privacy Policy.

2. **Information We Collect, Use or Disclose**

- 2.1. In order for us to provide our services and for the operation of our business and to provide services of recruiting and placing individuals for potential work assignments (and related services) with our customers and/or directly at the Company, or to act as an employer or hirer of record for individuals employed or engaged by the Company, or provide human resources related services to our customers, we must collect certain personal data from and about individuals who, either have been, are presently, or will be in the future, our applicants, candidates, employees, contractors, vendors, and / or customers. In the event we are unable to collect the required personal data from such individuals, we may not be able to proceed with the abovementioned services, including providing potential employment, job placements and / or work assignments, for such individuals.
- 2.2. The types of personal data collected, used, processed, disclosed and stored by us, depends on the circumstances and/or the purposes for which we may need to process your personal data. It also depends upon the relationship between the Company and the data principal, such as an employer-employee relationship, a customer-vendor relationship etc. Hence, subject to the aforesaid, such personal data may include the information set out in **Annexure 1** hereto.
- 2.3. Further, your interactions with our websites and mobile applications may also result in the collection, processing, and storage of the following types of information from you:
 - a) Geolocation data;
 - b) Saved preferences or information that you have provided to us in digital form;

- c) Internet protocol address, cookie data, browser type, browser language, referring URL, files accessed, errors generated, time zone, operating system, and other visitor details collected in our log files;
- d) Records of interaction with our representatives;
- e) Your usage details such as time, frequency, duration and pattern of use, features used, and the amount of storage used; and
- f) Other information you may provide to us, such as through surveys, interactions with our Social Media, or other mediums used to contact the Company.

2.4. Some of our websites require you to provide your personal data, such as when you create a profile and log-in credentials. Instead of having to type in your personal data, some of these functionalities may allow you to use third-party authentication tools such as Facebook, Instagram, Twitter, and Google to populate certain fields. By authenticating through one of the social media options, you allow us to receive your personal data and other information that is accessible through these tools. This information may be incorporated into your profile. For any such tool you choose to use, we encourage you to also review the tool provider's privacy policy and any terms and conditions.

2.5. We may use your personal data to permit you to participate in live social media feeds. If you choose to participate, your public username may be displayed on the sites along with your post, including, but not limited to, comments, images, and video.

2.6. We may provide you with access to third-party functionality that allows you to post content to your social media account(s). Any information that you provide to your social media account(s) through use of such third-party functionality is governed by the applicable third party's privacy policy and not by this Privacy Policy. As a result, we have no control over the privacy policies or policies that can be accessed via links from this website. For the avoidance of doubt, we are not responsible for any personal data that you provide to such third party.

3. **The Purposes for which We Collect, Use and Disclose Your Personal Data**

3.1. We hereby represent that we do not sell or involve ourselves in businesses related to selling information. However, in some cases, we may have to disclose the personal data that we have collected, subject to applicable laws at all times. In this regard, we will/may collect, use, disclose and/or process your personal data for one or more of the following purposes, subject to applicable laws, including any notifications or circulars published by the relevant governmental authorities from time to time:

- a) administering, processing and/or dealing with any transactions between you and the Company and/or any of its related corporations including but not limited to any application by you for employment or work with the Company;

- b) recruiting, assessing and/or matching you with/for potential positions or assignments with third party organisations (or our customers), and/or dealing with matters related thereto such as offering you a placement of work or job with such third party organisations (or our customers) or referring you for employment to a third party organisation (or our customer);
- c) administering, managing and/or dealing with the provision of work or job placement services to you. This includes us sharing your personal data with our customers or third party organisations, for your potential placement or employment opportunities with those customers/third party organisations who are seeking employees or workers, or to the organisation to which you have been assigned to work;
- d) carrying out your instructions or responding to any inquiry given by (or purported to be given by) you or on your behalf;
- e) administering, facilitating, processing and/or dealing in any matters relating to your use of any of the Company's or its related corporations' websites, any functionalities on the websites or any transactions or activities carried out by you on or through any of the Company's or its related corporations' websites, such as but not limited to live social media feeds;
- f) monitoring, processing and/or tracking your use of any of the Company's or its related corporations' websites in order to provide you with a seamless experience, facilitating or administering your use of any of the Company's or its related corporations' websites, and/or to assist us in improving your experience in using any of the Company's or its related corporations' websites;
- g) contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering your use of any of the Company's or its related corporations' website or any transactions you have with us, or for the provision of our services to you. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages;
- h) carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations applicable to us (whether in India or non-India), the requirements or guidelines of governmental authorities which we determine are applicable to us (whether in India or non-India), and/or our risk management procedures that may be required by law (whether in India or non-India) or that may have been put in place by us;
- i) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned; dealing with conflicts of interest; or dealing with and/or investigating complaints;

- j) creating reports with respect to our transactions with you, and/or producing statistics and research of such transactions for internal and/or statutory reporting and/or record-keeping requirements for us or our related corporation(s);
- k) managing internal operations including conducting data analytics for the purpose of system and process improvements and enhancements to human resources processes;
- l) complying with or as required by any applicable law, governmental or regulatory requirements of any jurisdiction applicable to us or our related corporations, including meeting the requirements to make disclosure under the requirements of any law binding on us or our related corporations, and/or for the purposes of any guidelines issued by regulatory or other authorities (whether of India or a non-India country), with which we or our related corporations are expected to comply;
- m) complying with or as required by any request or direction of any governmental authority (whether India or non-India) which we are expected to comply with; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities. For the avoidance of doubt, this means that we may/will disclose your personal data to the aforementioned parties upon their request or direction;
- n) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside India;
- o) facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business of the Company and/or its related corporations; and / or
- p) dealing with and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves the Company as a participant and other third parties.

(the purposes set out above shall be collectively referred to as the “**Purposes**”).

3.2. Subject to applicable law at all times, the Company may/will need to disclose your personal data to third parties, whether located within or outside India, for one or more of the above Purposes, as such third parties would be processing your personal data, and you hereby acknowledge, agree and consent to such disclosure for one or more of the Purposes. In this regard, you hereby acknowledge, agree and consent that it may be necessary for us to disclose such information to third parties to carry out their duties for one or more of the above Purposes and for the said third parties to subsequently collect, use, disclose and/or process your personal data for one or more of the above Purposes and connected reasons. Without limiting the generality of the foregoing or of the immediately preceding paragraph setting out the Purposes, such third parties include:

- a) our associated or affiliated organisations or related corporations;
- b) any of our agents, contractors or third party service providers that process or will be processing your personal data on our behalf including but not limited to those which

- provide administrative or other services to us such as mailing houses, telecommunication companies, information technology companies and data centres;
- c) our customers or third party organisations, who may be your potential employers or hirers or organisations which engage you for your services; and
 - d) any other third parties to whom disclosure by the Company is for one or more of the Purposes and such third parties would in turn be collecting and processing your personal data for one or more of the Purposes.
- 3.3. Your consent pursuant to this Privacy Policy is additional to and does not supersede any other consent that you had provided to the Company with regard to processing of your personal data.
- 3.4. Please note that data that has been anonymized and which does not personally identify you, is not covered by this Privacy Policy.
- 3.5. We hold our employees, contractors, agents, and suppliers accountable for maintaining the trust that you place in us with your personal data. Your personal data will not be used or shared except as in accordance with applicable law relating to personal data and this Privacy Policy.
- 3.6. Consistent with paragraph 3.2 above, as a result of the scope of the Company's operation, the sharing of your personal data with our other group entities, service providers, and customers may result in your personal data being sent to countries outside of your country of residence, which may have data protection laws that differ from those in your country of residence. Regardless of the source or destination location of your information, we will at all times protect your personal data as described in this Privacy Policy, and only transfer your personal data to third parties in accordance with and subject to applicable data protection laws at all times, including any notifications or circulars published by the relevant governmental authorities from time to time.
- 3.7. ***Legitimate Uses:*** The Company may process your personal data without taking any specific consent for certain legitimate uses prescribed under applicable Indian laws, namely: (a) where you provide your personal data voluntarily for a specified purpose, and in respect of which you have not expressly withdrawn your consent, (b) for purposes of the relevant government or any of its agencies, in order to provide subscribed benefits or for performance of their duties, (c) to ensure compliance under law or judicial decree, order or judgment, (d) in response to a medical emergency or ensuring medical treatment in cases of public health emergencies, (e) for taking measures, providing assistance or ensuring your safety in case of disasters or breakdown of public order, and/or (f) for employment purposes or safeguarding us as an employer against any losses or liabilities.

4. Entities Processing Your Personal Data

The entities collecting and retaining / storing your personal information include the Company and its affiliates. The Company may also engage third party data processors, in accordance with applicable law, for processing of your personal data. In the event that you require a list of such entities processing your personal data, please write to our consent manager.

5. Cookies and Web Beacons

- 5.1. The Company's websites use "cookies" to help personalize the online experience. A cookie is a piece of data stored on the user's computer or mobile device tied to information about that user. They also allow us to identify those devices when they return to a website. We have obtained consent for the collection and use of cookies through consent mechanism such as pop-up or banner. By using our website, you consent to our use of cookies as described in this cookie policy. You can set your browser to notify you before you receive a cookie, giving you the option of whether to accept it. You can also set your browser to turn off cookies. If you do so, some areas of our websites may not function properly. We use both session ID and persistent cookies. A session ID cookie simply expires once the user closes the browser. A persistent cookie is a small text file stored on the user's hard drive for an extended period of time. These can be removed by following the instructions in your Internet browser's help file. We may update this cookie policy from time to time to reflect changes in our practices or to comply with legal requirements. We will notify you of any significant changes to this policy.
- 5.2. To help us provide better service, we sometimes collect anonymous information from visits to our websites through the use of "web beacons". These do not access your personal data, but rather allow us to log users who have visited our websites. This anonymous information is sometimes known as "clickstream data." We or our vendors may use this data to analyse trends and statistics to help us provide better customer service. If you do not want your transaction details used in this manner, see the paragraph above on cookies.
- 5.3. We allow third-party companies to collect certain anonymous information when you visit our websites. These companies may use non personally identifiable information during your visits to our websites in order to provide advertisements about goods and services likely to be of greater interest to you. These companies typically use a cookie or a third party web beacon to collect this information.
- 5.4. Links: For links to organizations not affiliated with us, we are not responsible for the privacy practices or the content of such websites. We recommend you review the terms and conditions of use and privacy policies in place on such websites.

6. Your Rights and Choices

- 6.1. The amount of personal data you are required to supply when requesting our services will be limited to that which is relevant to and reasonable for the supply of such services or for the purposes for which such personal data is being collected.
- 6.2. Individuals have various data protection rights with respect to personal data that businesses and organizations may gather under privacy legislations, including:
- a) **Right to access:** You have a right to access and review your personal data provided to us, and request copies, including a summary of personal data which is being processed and the processing activities undertaken with respect to such personal data. We will need enough information from you in order to ascertain identity as well as the nature of your request.
 - b) **Right to correct:** You have the right to request that any inaccuracies in your personal data be corrected, or your personal data is updated or made complete. We shall take reasonable efforts to verify the accuracy of personal information and make any necessary corrections.
 - c) **Right to Erasure:** If you ask us to erase your personal data, we will respect your request and erase your personal data, subject to certain exceptions provided by law.
 - d) **Right to Withdraw:** You have the right to withdraw your consent provided for processing of your personal data at any time. However, your withdrawal of consent could result in certain consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue providing our services such as recruitment, placement, or employment, as the case may be.
 - e) **Right to Nominate:** In the event that the personal data is processed within the laws of India, you have the right to nominate any other individual to exercise your rights in the event of death or incapacity.

If you choose to exercise any of the above rights or need further information in relation to the same, you can email your request to our consent manager and may expect a response within 30 days or such shorter time period as may be mandated as per applicable laws.

- 6.3. Where you have asked us to do the above or have otherwise given us your consent to do the above, we may periodically use your contact information to send you updates via e-mail in order to alert you to our marketing and promotional materials or opportunities, or services relevant to your interactions with us, such as jobs in our database that match your selected criteria. Each notification will provide instructions on how to opt out of receiving similar e-mails from the registered service or resource. At the point where we request personal data about you, our site also gives you the opportunity to decide which communications you wish to

receive. The database is automatically updated with your preferences when you opt out. When your interactions with the Company have resulted in your registration for multiple services or resources, it may be necessary to opt out from each service separately. Please note that any such marketing / advertising activities will always be in accordance with and subject to applicable laws.

7. Administration, Management, Protecting and Retaining Your Information

- 7.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by the Company to make a decision that affects you or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from you not updating us of any changes in your personal data that you had initially provided us with.
- 7.2 We will also put in place reasonable and appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption, use of privacy filters, access control, password protection and disclosing personal data both internally and to our authorised third-party service providers and agents and disclose personal data only on a need-to-know basis or for legitimate uses, to prevent any unauthorized access, collection, use, disclosure, copying, modification, disposal, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.
- 7.3 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures. Any unauthorised use of your personal information or any suspicious activity on your account is not our responsibility and cannot be held against us. By utilising our website or our services, you acknowledge and accept that we are not responsible for any disclosure of your information caused by transmission mistakes or unauthorised acts of third parties.
- 7.4 We will also put in place measures such that your personal data in our possession or under our control or is disclosed to our data processors is destroyed and/or anonymized as soon as it is reasonable to assume that (a) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (b) retention is no longer necessary for any other legal or business purposes.
- 7.5 We restrict access to personal information to those of our employees who: (a) need to access such data in order to fulfil our obligations under this Privacy Policy and agreements concluded

with us; (b) have received the necessary and ongoing training on how to process, handle, and care for personal information; and (c) are subject to confidentiality obligations as required by applicable law. The Company takes measures to make sure that any employees who have access to personal data are trustworthy, capable and regularly trained.

8. Data Breach Notification

- 8.1. In the event of a breach of security leading to accidental or unlawful destruction, loss, sharing, use, alteration, unauthorized disclosure of, or access to, personal data that compromises the confidentiality, integrity or availability of personal data, we shall promptly assess the impact and once assessed that it is a notifiable data breach, we shall notify every individual whose personal data is comprised of such data breach, and also report this breach to the relevant authority(ies) based on the country's data breach notification requirements, such as the Data Protection Board of India, in the form and manner as may be prescribed under applicable laws. We will notify you when the data breach is likely to result in significant harm to you after our notification to the relevant authority(ies). We may also notify other relevant regulatory agencies, where required.
- 8.2. If we are a Data Processor (data intermediary), we shall inform the relevant Data Fiduciary (data controller) immediately of any data breach, so they can promptly assess the impact and comply with their data breach notification obligation.

9. Updates to this Privacy Policy

We may modify or update this Privacy Policy from time to time. If we change our Privacy Policy, we will post the revised version here, with an updated revision date. We encourage you to review our Privacy Policy whenever you use this website or our services, or enter into any relationship with us, in order to stay informed about our information practices and the ways you can help protect your privacy.

10. Communication

All communications, claims and notices can be sent to our consent manager at dpo_in@persolkelly.com. We will respond within 30 days or such shorter time period as may be mandated as per applicable laws.

11. Grievance Redressal

Grievances in relation to this Privacy Policy can be sent to our consent manager and you may expect a reply within 30 days or such shorter time period as may be mandated as per applicable

laws. An appeal against the decisions of the consent manager can be made to the adjudicatory authority under applicable laws, in the manner prescribed thereunder. However, please note that for Indian residents, in accordance with applicable laws, you are required to compulsorily exhaust the opportunity of redressing your grievance before the consent manager, prior to approaching the relevant adjudicatory body appointed under such laws.

12. How to Contact Us

If you have any questions, grievances or complaints, or comments about this Privacy Policy and/or the handling of your personal data by us, please contact our consent manager at:

Email Address: dpo_in@persolkelly.com

Address:

PERSOLKELLY India Private Limited Unitech Cyber Park, Tower C, 12th Floor Unit N0.
1202- 1204 Sector - 39, Gurgaon - 122 002, Haryana – India

13. Governing Law and Jurisdiction

This Privacy Policy shall be governed by and construed in accordance with the laws of India, excluding any principles related to conflicts of law. By accepting this Privacy Policy, you consent to the exclusive jurisdiction of the courts located at Gurgaon for any disputes arising from or in connection with this Privacy Policy.

Annexure 1 | Details of Personal Data

1. List of Personal Data

The below list sets out the personal data which the Company may collect from you, for the purposes of processing the same in accordance with this Privacy Policy:

- a) Name;
- b) Contact information (address, phone number, e-mail address);
- c) Passport or identification details;
- d) Employee identification number;
- e) Date of birth;
- f) Gender;
- g) Contents of any other identification provided to the Company for application or employment purposes;
- h) Education and employment history;
- i) Language proficiencies ,Work-related skills and experience;
- j) Professional credentials or licenses;
- k) Membership in professional organizations;
- l) Any other information contained on an individual's Curriculum Vitae (CV), information you provide regarding your career interest and other information about your qualifications for employment;
- m) Citizenship and work authorization status;
- n) Disability and health-related information;
- o) results of drug tests
- p) Next-of-kin or emergency contact information;
- q) Information from and related to publicly published profiles you've created on job-related social media platforms and job boards (such as LinkedIn, Monster, or Indeed);
- r) Information provided by references; and
- s) Information regarding your career interests, preferences, and qualifications.
- t) National identification or other government – issued identification number, tax identification, passport number or social security number(s);
- u) Financial or bank account information;
- v) Results of drug, criminal, and/or background screenings;
- w) Benefits selections, potentially including health insurance and retirement planning information;
- x) Biometric data;
- y) Information contained within your personnel file with the Company, such as performance reviews, disciplinary action, and other payroll related information; and

- z) Health information, including that related to a work-related claim (e.g. workers' compensation claim).

2. Other Miscellaneous Personal Data

In addition to paragraph 1 above, as an employer, we may also seek the following personal data from our present, past or prospective employees:

- a) **Basic Employee Data:** Job title, scope of work, supervisor details, work e-mail address, employment location, employee number, identification photographs, and other work-related contact information.
- b) **General Human Resources Data:** Language skills, permanent account number, Aadhaar number, emergency contact information, home address, employment status, employee type, educational information, certifications and licenses, work-related skills and training, previous employer information, compensation information, job performance information, marital status, number of children, job qualifications, work references, leave details, information on work-related accidents, and other types of information needed to establish, manage, or terminate your work relationship with us.
- c) **Benefits Data:** Details of statutory benefits availed, date of hiring, termination date, tax withholding and reporting information, accounting information, and details of applicable bonus and incentive plans.
- d) **Security and IT Access Control Data:** Information regarding your access and use of the Company's facilities and computer systems, including data from monitoring systems and voice recordings, passwords for accessing Company's computer systems, security badge information, security camera and video images, and any other information necessary for us to preserve the safety and security of Company's facilities and computer systems.
- e) **Data Relating to Background Check, if Required/Permitted Under Law:** Where required and/or permitted by applicable law, we may collect the results of credit and criminal background checks, government issued licenses / identification cards, and vehicle registration and insurances / licenses procured in respect of such vehicles.

Further, in order to comply with applicable statutes, rules, and regulations pertaining to equal employment opportunities or to assist the Company or its related corporations in compiling data for its equal opportunities practices and reporting, we may also ask you to provide personal information such as gender, race/ethnicity or disability information. The provision of this type

of information will be voluntary, unless it is required by law, and failure to provide this information will not hinder your employment or project opportunities.