

# Global Data Privacy Notice for Job applicants

Version 1.0 | 14 November 2022

## Copyright Information

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This document is the exclusive property of LTIMindtree Limited (LTIMindtree); the recipient may not copy, transmit, use or disclose the confidential and proprietary information in this document by any means without the expressed and written consent of LTIMindtree. The recipient of this document must be aware of the confidentiality of LTIMindtree's practices and procedures; and that these documents can only be used for responding to LTIMindtree's operations methodology.

## Revision History

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Please keep the latest version on top

| Ver | Change Description | Sections | Date                            | Author              | Reviewer | Approver             |
|-----|--------------------|----------|---------------------------------|---------------------|----------|----------------------|
| 1.0 | Initial Document   | All      | 14 <sup>th</sup> November, 2022 | Data Privacy Office | Legal    | Data Privacy Officer |

## References

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For more details, please refer to the following documents:

| No | Document Name                              | Ver | Location  |
|----|--|-----|---|
| 1. | LTIMindtree General Data Privacy Statement | 1.0 | <a href="https://www.ltimindtree.com/general-privacy-policy/">https://www.ltimindtree.com/general-privacy-policy/</a> |
| 2. | LTIMindtree Cookie Policy                  | 1.0 | <a href="https://www.ltimindtree.com/cookie-policy/">https://www.ltimindtree.com/cookie-policy/</a>                   |

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# Introduction

For the purposes of evaluating your candidature and interview with LTIMindtree Limited, a company incorporated in India having its registered address at Gate No. 5, L&T Technology Center, Saki Vihar Road, Powai, Mumbai – 400072, India, which has several branches and subsidiaries around the world (“LTIMindtree” or the “Company” or “we” or “us” or “our”), we collect, hold, process and transfer Personal Data (as defined below) about you as it is necessary for the administration, management and performance of the purpose (as detailed in Section 6) in our capacity as a data controller.

Protecting the privacy rights of data subjects and safeguarding their Personal Data is now being treated as a basic right of an individual and a legal requirement in many parts of world.

LTIMindtree, being a global organization, respects the privacy of data subjects and is committed to complying with the applicable data privacy laws and legislations (including but not limited to EU General Data Protection Regulation 2016/679 (the “GDPR”), the GDPR as saved into UK law (the “UK GDPR”) (references in this Notice to GDPR also include UK GDPR) California Consumer Privacy Act, California Privacy Rights Act, The Privacy Act 1988 (Australia) including the Australian Privacy Principles (APP), Data Protection Act 2018 (UK), Information Technology Act 2000 read along with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and Personal Data Protection Act 2012 (Singapore), the Federal Law on Protection of Personal data held by Private Parties and its Regulations (Mexico) (the “LFPDPPP, in its Spanish acronym), the Swiss Federal Act on Data Protection 1992 and as of September 1, 2023, the Swiss Federal Act on Data Protection 2020, the Federal Decree-Law No. 45/2021 on the Protection of Personal Data (UAE), the Protection of Personal Information Act 4 of 2013 (South Africa), the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA) and any substantially similar provincial law, Personal Data (Privacy) Ordinance Cap. 486 (Hong Kong), the Personal Information Protection Law (“PIPL”) (China), the Privacy Act 1988 (Cth) (Australia), and other applicable privacy laws to the extent that they apply to LTIMindtree’s data processing and business operations) (the “Data Privacy Laws”).

We treat your Personal Data in accordance with the Data Privacy Laws and the purpose of this notice is to make you aware of:

- Which Personal Data we Collect?
- How we collect and Use Your Personal Data?
- Purpose and lawful basis of Processing
- How we Share and Disclose Personal Data?
- What Rights do you have?
- How do we keep Personal Data secure?
- How to get in touch with us regarding Data Privacy?

# Scope

**Applicability:** This Notice applies to all job applicants of LTIMindtree. This Notice does not form part of any contract of employment or other contract to provide services. It covers Personal Data and Personal Information disclosed by you which is Processed by LTIMindtree, during the course of your interaction with us.

**Role:** LTIMindtree acts as a Data Controller (as defined below) with respect to any Personal Data and Personal Information it holds about you. LTIMindtree is responsible for ensuring that it uses Personal Data and Personal Information in compliance with the Data Privacy Laws. The relevant entities that may act as the Data Controller are listed in Section 9 of this Notice.

We need to keep and process data about you for acceptable business and security purposes, for complying with legal obligations and for record keeping purposes. The data we hold, and process will be used for evaluating your candidature and interview, operational and administrative purposes only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully, and appropriately, whilst you would be associated with us, at the time when your association ends and after you have left us.

# Definitions

The meaning of some of the terms in use in the Notice are explained below:

| Term   | Description  |
|--|--|
| Personal Data  | Means any information relating to an identified or identifiable natural person (“Data Subject”); Any information which constitutes “personal data” or “personal information” of Data Subject under the applicable Data Privacy Laws, including information which can reasonably associate or link to an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This includes the defined term of personal information as defined in Canadian data protection laws. Personal Data includes ‘personal information’ as defined in the Privacy Act 1988 (Cth) (Australia).<br>With respect to Chinese residents, Personal Data does not include information that has been anonymized. LTIMindtree does not collect Personal Data from Chinese residents that are under the age of 14. |
| Personal Information (applicable only to California residents) | Information pertaining to residents of California that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, but does not include information that is lawfully made available from federal, state or local government records, nor does it include “de-identified” or “aggregate customer information” as those terms are defined pursuant to the CCPA.   |

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| <p>(under US laws)</p>   | <p>LTIMindtree does not collect Personal Information from California residents that are under the age of 16.</p>   |   |  |  |  |
| <p>Sensitive Personal Data (including specific categories of Personal Data under GDPR)</p> | <p>Pursuant to Article 9(1) GDPR, specific categories of personal data refer to the processing of personal data revealing racial or ethnic origin, or political opinions, or religious or philosophical beliefs, or trade union membership, or the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, or data concerning health or data concerning a natural person's sex life or sexual orientation. Sensitive Personal Data includes 'sensitive information' as defined in the Privacy Act 1988 (Cth) (Australia).</p> |   |  |  |  |
|  | <p>For Mexico only: In addition to the preceding, any other categories of personal data that touch the most private areas of the data subject's life, or whose misuse might lead to discrimination or involve a serious risk for the data subject are also considered as sensitive data.</p>   | <p>For Switzerland only: The definition of "a natural person's sex life or sexual orientation" also includes the intimate sphere (instead of the sexual life/orientation), social security measures, administrative or criminal proceedings and administrative or criminal sanctions.</p> | <p>For Chinese residents only: In addition to the preceding, the term also includes other Personal Data of which the leakage or illegal use could easily lead to the violation of the personal dignity of a natural person or harm to personal or property safety, such as information on biometric identification, financial accounts, personal whereabouts and personal information of minors under the age of 14.</p> | <p>With respect to California residents, in addition to the preceding, the term also includes government identification numbers, financial numbers or financial account access credentials, precise geolocation, and the contents of communications to which LTIMindtree is not an intended recipient.</p> | <p>In Denmark only: Information on social security numbers and criminal offences are not considered as sensitive personal under the GDPR but constitutes its own category of information. Processing of this requires specific legal basis under the Danish data protection act.</p> |

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| Process, Processes, Processed or Processing | Means any operation or set of operations which is performed on Personal Data or Personal Information, or on sets of Personal Data or Personal Information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.   |
| Data Subject                                | <p>Means to a particular natural person (i.e., an identified or identifiable natural person) to whom Personal Data relates.</p> <p>In case of a minor/ individual with mental disabilities, the data subject would be represented by a legal representative or the holder of parental responsibility (parent/ guardian).</p> <p>For the purpose of clarity of this Notice, "Data Subject" means LTIMindtree current and previous employees, job applicants, current, prospective and previous customer personnel, current and previous partner/vendor personnel, website visitors, sub-contractors and visitors.</p> <p>LTIMindtree does not generally process Personal Data/ Personal Information and Sensitive Personal Data from Data Subjects that are under the age of 18 except in specific cases (See. Section 8).</p> <p>For the purpose of CCPA, Data Subject shall include California residents.</p> <p>With respect to Chinese residents, LTIMindtree does not collect Personal Data from Chinese residents that are under the age of 14.</p> |
| Data Controller                             | Means the natural or legal person, organization, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by national or applicable laws, the controller or the specific criteria for its nomination may be provided for by national or applicable laws.   |
| Data Processor                              | Means a natural or legal person, organization public authority, agency or other body which processes Personal Data on behalf of the Data Controller  |

Please refer to the Global Data Privacy Policy (External) :

[https://www.ltimindtree.com/privacy\\_policy/](https://www.ltimindtree.com/privacy_policy/) for terms that have not been defined above. Please also refer to the relevant jurisdiction specific Data Privacy Laws for all other terms.

## What Personal Data is collected?

LTIMindtree collects only necessary Personal Data directly from you as well as from other available sources (as detailed in Section 5) to the extent legally justified and/or permitted by applicable local law. The categories of Personal Data that are typically collected and processed in the recruitment context are:



- Identification data: name, age, sex, marital status, signature, photo, national identification ID/number;
- Contact information: address, e-mail, telephone number;
- Financial data: socioeconomic study;
- Information on your personality and skills; personal and work references.
- Competencies, skills, experience and education, e.g., your CV or resume, previous employment history/details, educational history/details and qualifications, third party references.
- Preferences, e.g., preferred country of employment, areas of interest as well as your preferred ways to be contacted by LTIMindtree);
- Your online user identity, e.g., usernames and other such information used in connection with authenticating you to our online recruitment management system.
- Technical Information: When you access our services online, our web servers automatically create records of your visit. Please visit [www.LTIMindtree.com](http://www.LTIMindtree.com) to know more about our Website and Cookie Policy.
- CCTV footage of you in the LTIMindtree reception area wherever CCTV cameras are located for security reasons, for the protection of our property and for health and safety reasons
- Where required for your role, and permitted or required by applicable laws, Personal Data such as OFCCP data, diversity data shall be collected
- Other information, such as information found from public sources, government agencies and portals, business networks, social media platforms and referrals as well as information related to reference checks, depending on the position you are applying for, and where necessary for the recruitment activities.
- Additionally, once you have been chosen from the shortlist, we may collect additional information such as expected compensation and remuneration details, information relating to your family members (for benefits administration, if voluntarily provided by you), visa and work permit (in case of expatriate), background check reports including educational, previous employment, dual employment, criminal data and credit history etc. where permitted by local law.

# How we collect your Personal Data/ Personal Information / Sensitive Personal Data

LTIMindtree collects Personal Data about the job applicants through application, forms, and interviews as a part of the recruitment process. This information would be collected by us in a number of ways through multiple channels while joining our organization and over time during our relationship with you:

- Directly from you (when you contact any LTIMindtree's representative via the LTIMindtree website, job portal or by telephone, online, email or in person). We will collect additional Personal Data during interviews and recruitment process.



- Through referrals from your friends, family or professional connects who work at/ with LTIMindtree to process your candidature.
- From third parties and other sources (through recruitment agencies, background verification agencies, former employers, employment agencies, credit reference agencies), which may also include public sources such as professional networking platforms.

# Purpose and legal basis of Processing

Personal Data is stored and Processed by us in the following ways and for the following lawful purposes:

- In case of an application for a role with us, to review and process a job application with us and (only where legally permissible and where strictly necessary to assess the suitability for the relevant role) to conduct background screening checks on the applicant including but not limited to the previous employment, criminal convictions, education, dual employment and other relevant checks (only when permitted or required by the applicable law);
- To carry out activities relating to employment contract with us (including, but not limited to, onboarding formalities, processing salary, administering benefits, managing and providing training relevant to the employee's role and managing performance);
- To provide the employee with benefits related to employment with us, including without limitation any employee gifts, awards, employee wellbeing initiatives, for the purpose of ensuring a safe workplace (vaccination details, accommodation details, where legally permissible and according to applicable law); for the purposes of compliance with law, for the purpose of encouraging and reporting on workplace parity such as diversity data and other affirmative action initiatives, etc.
- To provide our products and services to customers;
- To comply with any legal and regulatory obligations that we have to discharge;
- To establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- Concerning employees or visitors to our premises, to record and monitor the use of our premises and/or information technology systems in order to maintain its security and protect them against fraud or unauthorised entry;
- Use Personal Data and Personal Information for our legitimate business interests, such as operating our website, managing the efficient management and operation of our business, conducting marketing activities designed to improve the products and services we offer to the Data Subject (subject to obtaining additional consent as may be required by applicable Data Privacy Laws), and administering the security of our business ("Legitimate Business Interests"); and
- Use Personal Data and Personal Information to prevent and respond to actual or potential fraud or illegal activities.
- Internal Research: We may Process Personal Information for internal research for technological development and demonstration.
- Transactional: We may transfer Personal Information as an asset through a merger, acquisition, bankruptcy or other transaction in which a Third Party assumes control of the

business in whole or in part. In such event, the Third Party cannot materially alter how it uses or shares the acquired Personal Information subject to certain exceptions.

We Process Personal Data and Personal Information based on the following legal bases:

- a. Performance of Contract: We process Personal Data and Personal Information, where necessary in order to take steps at the request prior to entering into a contract or for the performance of a contract. For instance, Processing of Personal Data and Personal Information for employment purposes (such as processing salary, administering benefits) or providing services to our customers which are necessary to execute the contract.
- b. HR Necessity: We may process Personal Data where necessary for human resources management implemented in accordance with the labour rules and LTIMindtree's internal regulations for employees formulated according to the law or collective contracts signed according to the law.
- c. Consent: Where permitted under applicable local laws, We may (but usually do not) Process Personal Data, Personal Information or Sensitive Personal Data based on the prior freely given consent from the data subject for a specific purpose. In such cases, the data subject has the right to withdraw his/her consent at any time by contacting the details provided in this Notice as set out in Section 17 below. In certain limited circumstances and where permitted by the law, even after withdrawal of Data Subject consent, we may be entitled to continue processing Personal Data on the grounds of other legal bases where we have a lawful reason to do so and as notified to the data subject. However, in certain jurisdictions, applicable local law may require that consent be obtained, and, in such circumstances, consent will be the lawful basis for which we process Personal Data.
- d. Legitimate Interests: We may process Personal Data / Personal Information where it is necessary for the purposes of our Legitimate Business Interests as a company, including for management purposes, which are outlined above, to prevent and respond to actual or potential fraud or illegal activities, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, in particular where the data subject is under 18 years old. When "legitimate interests" are not a legal basis for processing under the applicable local law, we will rely on your consent.
- e. Legal Obligations: We may process your Personal Data and Personal Information where it is necessary in order to comply with applicable legal and/or regulatory obligations, establish, exercise or defend our legal rights or for the purpose of legal proceedings.
- f. Other "Public Interest" Grounds: We may process your Personal Data, Personal Information (or where relevant, your Sensitive Personal Data) on other public interest grounds where it is subject to regulatory requirements where Processing is necessary by Us for the performance of a task mandated by governmental authorities, regulatory authorities or any other law enforcing authorities in the public interest.

We will process your Personal Data for the following purposes and based on the following legal bases, respectively:

Employment Opportunities: Where you have applied for a role with us, to review and process your job application with Us and (only where legally permissible and where strictly necessary to assess your suitability for the relevant role) to conduct background screening checks on you (when permitted or required by the applicable law).

Using the legal basis of Legitimate interest of LTIMindtree for employment opportunities and recruitment purposes, legal obligation or consent (when legitimate interest is not a legal basis for processing under local laws)

| Purpose of Collection  | Description  | Lawful Basis   |
|--|--|--|
| Communicating with you, in context of recruitment activities | To obtain additional information about your suitability for the role where necessary;<br>To inform you of available similar vacancies;<br>To communicate with you relating to your application, interview, recruitment process and to fulfil your requests.  | Legitimate Interest of LTIMindtree for employment opportunities and recruitment purposes or consent (when legitimate interest is not a legal basis for processing under local laws)  |
| Managing recruitment and resourcing activities               | Organizational planning;<br>Interview and selection process including setting up and conducting interviews and assessments;<br>To evaluate, select and recruit applicants;<br>To contact third party referees provided by you to evaluate your previous employment.  | Legitimate Interest of LTIMindtree for employment opportunities and recruitment purposes or consent (when legitimate interest is not a legal basis for processing under local laws)  |
| Post Shortlisting  | Shortlisting and offer management.<br>We may also share your information with our customers. Further, we may collect additional personal information (as mentioned in the previous section), to carry out background verification checks (on occasional basis criminal background checks in accordance with local laws), facilitate travel for face-to-face interviews, to roll-out employment offer letter and for other administrative purposes. | Legitimate Interests of LTIMindtree for employment opportunities and recruitment purposes or consent (when legitimate interest is not a legal basis for processing under local laws) |
| Monitoring   | When you visit our premises, to record and monitor your use of our premises and/or information technology systems in order to maintain its security and protect them against   | Legitimate Interest of LTIMindtree for employment opportunities and recruitment purposes   |

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|                  | fraud or unauthorised entry.  | or consent (when legitimate interest is not a legal basis for processing under local laws)  |
| Other Purposes   | Your information is processed when it is required to check your entitlement to work, to fulfil immigration mandates, to deduct tax, to comply with health and safety laws etc   | Legal Obligation  |
| Audit Compliance | We may process personal data as part of our audit processes and engage third party auditors, from time to time. We have ensured that only personal data absolutely necessary is processed during such audits in order to comply with applicable laws, defense or exercise of our legal rights and to purpose the legitimate business interests. | Legitimate Interest of LTIMindtree for employment opportunities and recruitment purposes or consent (when legitimate interest is not a legal basis for processing under local laws) |

We may process your Personal Data (or where relevant, your Sensitive Personal Data) on other public interest grounds where we are subject to regulatory requirements and to the extent such processing is necessary by us for the performance of a task mandated by governmental authorities, regulatory authorities or any other law enforcing authorities in the public interest. We shall notify you prior to processing such data.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so without undue delay. 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 law.

## Processing Sensitive Personal Data

We only process Sensitive Personal Data where legally permissible. If so, the collection and further processing of Sensitive Personal Data the following can only be lawful if:

- The Data Subject has given explicit Consent or Explicit Written Consent (where applicable) to the processing of his/her Sensitive Personal Data for a specified purpose, or where the Data Subject is physically or legally incapable of giving consent, but the processing is necessary to protect a vital interest of the Data Subject for example, where emergency medical care is needed.
- Without explicit consent when such Processing of Sensitive Personal Data is specifically authorised or mandated by applicable local Data Privacy Laws.
- When the processing of Sensitive Personal Data is necessary for the establishment, exercise or defence of the legal claims.

In addition, we may only process Sensitive Personal Data about employees or job applicants within the limits of the applicable laws of each country, for the following reasons:

- Where such processing is necessary for the purposes of carrying out the obligations and exercising specific rights of LTIMindtree or of the employee or job applicants in the field of employment and social security and social protection law, for employment-related purposes, as authorised by law or a collective agreement providing appropriate safeguards for the protection of fundamental rights and interests of the employee or job applicants.

Additional requirements from countries specific privacy laws:

- LTIMindtree shall process sensitive personal data where the below mentioned lawful grounds of processing for special categories of data is applicable:
  - Processing is necessary for compliance with any applicable regulatory, auditing, accounting, anti-money laundering or counter terrorist financing obligations or for the prevention or detection of any crime.
- For France: LTIMindtree does not process genetic, biometric data and data concerning health.
- LTIMindtree should process special categories of personal data if processing is authorized by (CNDP) Morocco<sup>1</sup>.
- In case the LTIMindtree intends to process special categories of personal data (data related to Marital relationship, criminal offenses etc.), LTIMindtree shall ensure that it obtains prior permission from Ministry of Transport and Communications (MoTC). MoTC may include other types of personal data in the definition of special categories of data if misuse or disclosure of such data may cause serious harm to an individual<sup>2</sup>.
- For Singapore: LTIMindtree shall ensure that National Registration Identification Number (NRIC) and other identification number like Birth Certificate numbers, Foreign Identification Numbers (“FIN”) Work Permit numbers are not collected, used or disclosed in Singapore except:
  - where required under Singapore law or an exception under the Personal Data Protection Act 2012 applies; or
  - where such collection, use and disclosure is necessary to accurately establish or verify the identities of Data Subjects to a high degree of fidelity.<sup>3</sup>
- LTIMindtree shall only use the name of the employee and only the last four digits of his or her social security number or an employee identification number other than a social security number, on the salary payslip<sup>4</sup>.
- If LTIMindtree processes Sensitive Personal Data for reasons not contemplated by Section 7027(m) of the California Consumer Privacy Act Regulations, it will provide a notice of the right to limit the use of Sensitive Personal Data pursuant to those regulations.
- In the UK, LTIMindtree processes special category personal data for purposes connected to employment.

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<sup>1</sup> Morocco - Law No 09-08, dated February 18, 2009

<sup>2</sup> Qatar - Law No. (13) of 2016 Concerning Personal Data Protection

<sup>3</sup> Singapore - Personal Data Protection Act (PDPA)

<sup>4</sup> USA - California Consumer Protection Act (CCPA)

- The processing of the Sensitive Personal Data must be limited to the minimum necessary. Databases containing Sensitive Data may not be created without justification, but only for legitimate, specific, and consistent purposes. The consent obtained for the processing of Sensitive Personal Data must be freely given specific, informed; unambiguous and in writing (by handwritten or electronic signature, or any other means of authentication).
- For China: LTIMindtree shall implement encryption measures for storage and transmission of Sensitive Personal Data with regard to Chinese residents.
- For Belgium: Under Belgian law<sup>5</sup>, the following measures must thus be taken in case genetic, biometric or health data are processed by LTIMindtree:
  - A list must be drawn up of all categories of persons (e.g., the manager of a department, IT personnel, all members of a specific team) that will be able to access the data, together with their status in relation to the envisaged processing activity.
  - A nominative list of all those persons must be drawn up and disclosed to the Belgian Data Protection Authority upon the latter's first request.
  - It should be ensured that those persons are under an obligation of confidentiality with respect to the personal data concerned.
- For South Africa: In terms of the South African Protection of Personal Information Act 4 of 2013, LTIMindtree will not Process Sensitive Personal Data unless the:
  - Processing is carried out with the consent of a Data Subject;
  - Processing is necessary for the establishment, exercise or defence of a right or obligation in law;
  - Processing is necessary to comply with an obligation of international public law;
  - Processing is for historical, statistical or research purposes to the extent that—
    - the purpose serves a public interest, and the Processing is necessary for the purpose concerned; or it appears to be impossible or would involve a disproportionate effort to ask for consent and sufficient guarantees are provided for to ensure that the processing does not adversely affect the individual privacy of the data subject to a disproportionate extent;
  - information has deliberately been made public by the Data Subject; or
  - provisions related to the specific sets of Sensitive Personal Data as prescribed by sections 28 to 33 of the Act are, as the case may be, complied with.
- For Luxembourg: LTIMindtree is prohibited from Processing genetic data for the purpose of exercising its own specific rights in relation to employment law<sup>6</sup>.
  - LTIMindtree is prohibited from Processing employees' medical data (including vaccination details) except in order to comply with a legal obligation<sup>7</sup>.
  - LTIMindtree is not permitted to conduct a criminal history search. LTIMindtree can only ask job applicants or employees to provide a criminal record, if certain conditions are fulfilled. LTIMindtree can only collect criminal record (Bulletin n°3 which includes convictions for certain offences and crimes) from the job applicants himself/herself if LTIMindtree makes a written request which must be included in the job offer and if such request is justified with respect to the job's description<sup>8</sup>.

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<sup>5</sup> Belgium – Belgian Data Protection Act

<sup>6</sup> Luxembourg – Luxembourg Data Protection Act 2018

<sup>7</sup> Luxembourg – Labour Code and Data Protection Authority Guidelines

<sup>8</sup> Luxembourg – Law of 29 March 2013 on criminal records



- For Denmark: LTIMindtree shall only process personal data related to criminal convictions under the explicit consent of the data subject, or where it is necessary for the purposes of a legitimate interest clearly overriding the interests of the data subject.<sup>9</sup>
- LTIMindtree shall only process personal data related to social security numbers when 1) it stems from the law, or 2) the data subject has given consent under Article 7 GDPR, or 3) where the conditions for processing personal data laid down in Article 9 (2) (a), (c), (b), (e) or (d) of the GDPR are met.<sup>10</sup>
- Processing of personal data in an employment context covered by Articles 6(1) and 9(1) of the GDPR may take place if the processing is necessary for compliance with the controller's or the data subject's employment obligations or rights laid down in other legislation or collective agreements.<sup>11</sup>

We may process Sensitive Personal Data about its employees or job applicants for the following reasons:

- Information relating to your health such as disability status (where required or permitted by local law), in order to make any necessary accommodations during our interview process;
- Where required for your role, and where permitted or required by applicable laws, Personal Data such as OFCCP data, diversity data shall be collected
- Occasionally criminal record (where required or permitted by local law), for criminal background check upon request from our customers. LTIMindtree shall process such information only based on your prior explicit consent or legal authorization when consent is not a valid legal basis for processing;
- For employment-related purposes, if it is necessary to exercise rights or comply with legal obligations derived from labour law, social security and social protection law, and there is no reason to believe that the employee has an overriding legitimate interest in not processing the data.

When processing Sensitive Personal Data, we will take appropriate and specific measures to safeguard the interests of preserving adequate data security over Sensitive Personal Data, taking into account the industry standard, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing.

## Personal Data of Individuals below 18 years

We process Personal Data or Sensitive Personal Data of any individuals below the age of 18 years only for travel, immigration purposes or when you are visiting our premises. If we are required to process Personal Data or Sensitive Personal Data of such individuals, then We shall do so by taking explicit consent from their legal guardians and from the minor if they have capacity to give

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<sup>9</sup> Denmark – Danish Data Protection Act

<sup>10</sup> Denmark – Danish Data Protection Act

<sup>11</sup> Denmark – Danish Data Protection Act



consent, based on their age and maturity. If it comes to your knowledge that We have unintentionally collected or received Personal Data or Sensitive Personal Data about an individual below the age of 18 years directly from them, then please immediately notify Us in the contact details provided in this Notice (Section 17 below) and We will accordingly delete such information.

Note: We do not collect, use nor process Personal data of Individuals below 18 years on our website. If you are below the age of 18 years, then We do not want you to provide any of your Personal Data in our website.

## With whom we share your Personal Data (the recipients/categories of the Personal Data)

- We may disclose some Personal Data/ Personal Information to affiliates within our corporate group under the following circumstances:
  - Personnel administration, employee work and business management purposes.
  - To provide service that is legally bound by a valid contract.
  - To carry out day-to-day business transactions.
  - To identify and contact the Data Subject.
  - To ensure compliance to local laws and regulations.
  - For Security Management purposes.
  - Events and Initiatives
- We may also share Personal Data/ Personal Information outside of the corporate group where we rely on Third Parties to assist in its processing activities, and we have satisfied legal requirements for such disclosure of the Personal Data. This includes:
  - Third Party agents/suppliers or contractors, bound by obligations of confidentiality, in connection with the processing of Personal Data/ Personal Information for the purposes described in this Notice. This includes IT and communication services providers.
  - Third Parties relevant to the products and services that we provide. This includes hardware or software manufacturers, other professional services providers, regulators, authorities and other governmental institutions.

- To the extent required by law, regulatory bodies, enforcement bodies or court order, we may disclose Personal Data/ Personal Information/ Sensitive Personal Data in order to comply with any legal/regulatory obligation. In such instances we might not notify you of such requests, unless permitted by the law.
- Where required for the performance of the role / task of employees of LTIMindtree role, and where permitted or required by applicable laws, business contact details and Personal Data / Personal Information of employees of LTIMindtree (Eg: OFCCP data, personal contact details) may be shared with our clients and suppliers.
- Employees may reach out to the contact details provided in Section 17 of this Notice to know the name of the third parties to whom we have shared their Personal Data.
- With respect to disclosing Personal Data/ Personal Information to Third Parties, written contracts and data sharing agreements with Third Parties will include restrictions prohibiting the Third Party from retaining, using or disclosing Personal Data/ Personal Information for any purpose except performing the services specified in the contract or as otherwise permitted by applicable Data Privacy Laws.
- Where it discloses Personal Data/ Personal Information to Third Parties, LTIMindtree will seek to use Data Processors or Sub processors that are capable of providing sufficient guarantees to implement appropriate technical and organisational measures in accordance with applicable Data Privacy Laws and shall put in place contractual mechanisms to ensure that the relevant Data Processor or Sub processor takes reasonable steps to ensure compliance with those measures.
- We have offices and operations in a number of international locations, and we share information between our group companies for business and administrative purposes through data processing agreements including the standard contractual clauses signed within the entity. Please click [here](#) to view the list of entities and branches of Larsen and Toubro.
- Where required or permitted by law, information may be provided to others, such as regulators and law enforcement agencies.
- Where required for your role, and where permitted or required by applicable laws, your business contact details and Personal Data (Eg: OFCCP data, diversity data, personal contact details) may be shared with our clients and suppliers.
- We may also share your resume and background verification status to customers, upon request, to comply with our contractual obligations with these customers (when permitted or required by the applicable law).
- From time to time, we may consider corporate transactions such as a merger, acquisition, reorganization, asset sale, or similar. In these instances, we may transfer or allow access to information to enable the assessment and undertaking of that transaction. If we buy or sell any business or assets, Personal Data may be transferred to a third parties involved in the transaction.

- To comply with our statutory and other obligations and for the proper management of the LTIMindtree Group, LTIMindtree and our service providers, we may also provide information to other third parties, including, but not limited to, auditors, accountants, lawyers and other professional advisers, as well as to administrative authorities, courts, law enforcement and/or regulatory authorities, arbitrators, experts, adverse parties and/or their advisers. LTIMindtree hereby ensures that in case of sub processing of your Personal Data the obligations that LTIMindtree bears will be contractually reflected in our agreements with our partners, vendors and any other third party.
- LTIMindtree does not sell any Personal Data under any circumstances.

# Retention and Disposal of Personal Data or Personal Information

How long we continue to hold your Personal Data/ Personal Information will vary depending principally on:

- Purposes identified in this Notice for using the Personal Data/ Personal Information– We will need to keep the information for as long as is necessary for the relevant purpose; and
- Legal obligations – laws or regulation set a minimum period for which We will have to keep your Personal Data/ Personal Information;
- Disposal of Personal Data/ Personal Information shall be handled with utmost care and shall be governed in accordance with reasonable data security practices as detailed by its internal policies governing data disposal;
- Personal Data/ Personal Information shall only be Processed for the period necessary for the purposes for which it was originally collected as per applicable law and as stated in the LTIMindtree Retention Policy.

# Cross Border Transfer

We are part of Larsen and Toubro Group ([www.larsentoubro.com](http://www.larsentoubro.com)) companies which is an international group of companies and, as such, We transfer Personal Data / Personal Information personal data concerning you to countries where LTIMindtree has operations, and in particular to India. We may transfer Personal Data between our group affiliates companies and data centers for the purposes described above. These data transfers are necessary to provide our products and

services. We may also transfer Personal Data on a need-to-know basis to our authorized third-party suppliers, or LTIMindtree customers and authorized business partners.

Where we transfer your Personal Data/ Personal Information/ Sensitive Personal Information outside of your jurisdiction, we will ensure that it is protected and transferred in a manner consistent with applicable Data Privacy Laws.

For transfers to our group companies, third parties, suppliers outside of the EEA, we use standard contractual clauses or an appropriate tool of transfer. You may reach out to us by contacting Us by using the contact details below as set out in Section 17 if you would like more details about the tool/method used.

For transfers outside other jurisdictions, We ensure that there are relevant data processing agreements in line with the applicable Privacy laws signed between its Data exporting branch and its Data importing branch with appropriate responsibilities articulated.

For details regarding the transfer of data between jurisdictions, please refer to the Global Privacy Policy which can be accessed [here](#).

## Security of Personal Data/ Personal Information/ Sensitive Personal Data

In order to comply with our data security obligations under applicable Data Privacy Laws, We have adopted the following physical, technical and organizational security measures to ensure the security of your Personal Data/ Personal Information and Sensitive Personal Data and PHI, taking into account the applicable industry standards, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for your rights and freedoms:

- That includes the prevention of their alteration, damage, loss, unauthorized processing or access, having regard to the nature of the data and the risks to which they are exposed by virtue of human action or the physical or natural environment.
- We shall comply with the security safeguards as per our contractual and statutory requirements in consultation with its internal I.T department.

- The Office of Data Privacy and Chief Information Security Officer shall assess the security measures implemented to safeguard Personal Data, Personal Information and Sensitive Personal Data on a regular basis and update the same, where required.
- All employees and contractors shall be imparted with mandatory Privacy training (e.g., Training on Embedding Privacy in Software Development etc.). Further confidentiality agreements and Non-Disclosure Agreements shall be signed by all employees and contractors on or before their joining date with LTIMindtree.
- We have implemented the following safeguards to ensure the Personal Data We collects, stores, processes and disclose is secure:
  - Physical Security Controls
  - Facility Perimeter, HD access reader, Data Centre, Video surveillance
  - IT Infrastructure Controls
  - Encryption, DLP, Data masking, controlled Portable ports, Access Control, Unauthorized soft-ware check, Data destruction, System Hygiene measures, Monitoring, User Access Management, Patch Management, Vulnerability Management.
- We have implemented an incident and breach management procedure to ensure that exceptions in data privacy compliance are promptly reported to the Office of the Data Privacy and to the appointed Data Protection Officer.

## Sale of Personal Data

We do not sell your Personal Data for monetary consideration. However, we may allow certain third parties (such as online advertising services) to collect your browsing activity and certain other Personal Data via automated technologies on our website in exchange for non-monetary consideration. We may share the categories of Personal Data listed below in order to improve the performance of our website, to enhance your browsing experience, to provide you a more personalized browsing experience, and to improve our advertising efforts. You can view a full listing of those third-party cookies and opt-out of their use in our cookie policy.

For more information regarding the above, please refer to the LTIMindtree California Privacy Statement you can access here - <https://www.ltimindtree.com/lti-california-privacy-policy/>.

# Rights of Data Subjects/What Rights do I have?

You may have certain rights relating to your Personal Data provided for under applicable law, such as the right to request access to your Personal Data and the processing activities on the Personal Data.

- Receive information regarding the processing of your Personal Data
- Request access to your Personal Data and the processing activities on the Personal Data.
- Request that your Personal Data is rectified if it is inaccurate or incomplete
- Request erasure of your Personal Data in certain circumstances.
- Request that the processing of your Personal Data is restricted in certain circumstances.
- Object to processing of your Personal Data in certain circumstances.
- Receive your Personal Data provided to us as a controller in a structured, commonly used and machine-readable format in certain circumstances.
- Lodge a complaint with an applicable supervisory authority.
- Object to, and not to be subject to a decision based solely on, automated processing (including profiling), which produces legal effects or significantly affects you (if applicable).
- Withdraw your consent provided at any time by contacting us, where the processing is based on your (explicit) consent.

If you wish to receive more details or carry out any specific rectifications to your Personal Data, please contact our Data Privacy Officer at [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com) with the following information:

- Full Name:
- Email id:
- Data Subject Right you want to exercise:
- Relationship with LTIMindtree (job applicant, student, customer, contractor, employee of LTIMindtree, website visitor, Visitor to LTIMindtree, former employee of LTIMindtree, on behalf LTIMindtree's Data subject, on behalf of a Data subject below the age of 16)
- Country of Residence:
- Request Details:

To exercise the rights outlined above in respect of your Personal Data, you may write to [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com).

As part of processing your request, we require you to provide certain Personal Data about you in order to verify your identity. Additionally, in accordance with your rights, you may designate an authorized agent to make a request on your behalf, if permitted by applicable laws. In order to comply with your request, we will require the Personal Data referenced above to be used for identity verification purposes, as well as the name, email address, and telephone number of your authorized agent.

LTIMindtree kindly asks you to scrupulously assess your legitimate right(s) and interest(s) before raising any official request under our platform.

### California Privacy Rights

The CCPA provides California residents with the right to request disclosure of the categories and specific pieces of Personal Information that the business collects, sells or discloses concerning California residents and we shall provide such information without charge to the requesting California resident after verifying the request. We are required to provide such information no more than twice in a 12-month period. Under the CCPA, "collects" includes information bought, rented, gathered, obtained received and accessed whether actively, passively or by observing the California resident, provided, however, that we are limited in terms of what we can disclose when such information is Sensitive Personal Data.

The CCPA requires that we provide data access and data portability to California residents.

Subject to certain exceptions, the CCPA grants rights to California residents to request the deletion of their Personal Information.

The CCPA prohibits discrimination against California residents that elect to exercise their rights under the CCPA.

The CCPA prohibits any agreement or contract that seeks to waive or limit California residents' rights under the CCPA.

Please contact the Data Privacy Officer if you are attempting to fulfil any of the above requests by writing to [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com) with the following information:

- Full Name:
- Email id:
- Data Subject Right you want to exercise:
- Relationship with LTIMindtree (job applicant, student, customer, contractor, employee of LTIMindtree, website visitor, Visitor to LTIMindtree, former employee of LTIMindtree, on behalf LTIMindtree's Data subject, on behalf of a Data subject below the age of 16)
- Country of Residence:
- Request Details:

If you belong to any other jurisdiction that is not listed above, you may reach out to the us by writing to [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com).

California residents who provide Personal Information are entitled to request information about themselves that we shared with Third Parties for their own direct marketing purposes (if applica-



ble), including the categories of information and the names and addresses of those businesses. We do not currently share the personal information of California residents with Third Parties for their own direct marketing purposes.

For more details regarding Data Subject Rights, please refer to the Global Privacy Policy that can be accessed [here](#).

## Existence of Automated Decision Making

We do not use your Personal Data to make decisions with legal or similar effects for you, based solely on the automated processing of your Personal Data. In case We will perform automated individual decision-making in the future, We will inform you prior to the processing and we will inform you on your rights, including your right to express your point of view and contest the decision.

## Your Duty to inform us of changes

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.

## Contact Details, Complaints and Grievances

If you have any questions, comments, or suggestions, complaints or grievances, of if you want to exercise your privacy rights or wish to raise or consult Us on any privacy issues, our use of Personal Data or Personal Information, you can contact our appointed Data Protection Officer (“DPO”).

Complaints related to Personal Data and Personal Information protection and any communications regarding enforcement of your privacy rights should be directed to the Data Protection Officer at the following contact details:

Global Data Privacy Officer for LTIMindtree Limited:

- Email: [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com)
- Address: Gate No. 5, L&T Technology Center, Saki Vihar Road, Powai, Mumbai – 400072

Data Privacy Office

Attention: Data Protection Officer

Phone- +91 22 67766776

Data Privacy Officer for LTIMindtree Limited (Germany Branch) and European Representative:

Email ID- [dataprotectionoffice.eu@ltimindtree.com](mailto:dataprotectionoffice.eu@ltimindtree.com)

United Kingdom Representative:

Email ID- [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com)

Switzerland Representative

Email ID - [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com)

United Arab Emirates

Email ID - [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com)

South African Representative

Email ID - [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com)

We will use reasonable efforts to respond your complaint within a reasonable time, usually within 30 days.

You may also raise a concern or lodge a complaint with the competent Supervisory Authority. The name and contact details of the Data Protection Authorities in the European Union can be found [here](#).

You may reach out to the DPO Office (in the above-mentioned contact details) in the event you want a copy of this privacy notice in the local language of European countries where LTIMindtree has an office.

If you are in Australia, and we are unable to satisfactorily resolve your privacy concerns, you can con-tact the Office of the Australian Information Commissioner on their website [www.oaic.gov.au](http://www.oaic.gov.au).

## Changes to our Privacy Notice

This privacy notice was last updated on 14 November 2022. This notice may be revised and updated from time to time.

If you have any questions about this Notice, please contact Data Protection Officer of LTIMindtree at [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com). You may also refer to our LTIMindtree Global Privacy Policy and LTIMindtree California Privacy Statement published on the website for further information on LTIMindtree's commitment towards privacy.

# LTIMindtree Limited

## Contact Information

Email: [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com)

Gate No. 5, L&T Technology Center,

Saki Vihar Road,

Powai, Mumbai – 400072

INDIA

Phone- +91 22 67766776

Web- [www.LTIMindtree.com](http://www.LTIMindtree.com)



**LTIMindtree** is a global technology consulting and digital solutions company that enables enterprises across industries to reimagine business models, accelerate innovation, and maximize growth by harnessing digital technologies. As a digital transformation partner to more than 700 clients, LTIMindtree brings extensive domain and technology expertise to help drive superior competitive differentiation, customer experiences, and business outcomes in a converging world. Powered by more than 85,000 talented and entrepreneurial professionals across 33 countries, LTIMindtree — a Larsen & Toubro Group company — combines the industry-acclaimed strengths of erstwhile Larsen & Toubro Infotech and Mindtree in solving the most complex business challenges and delivering transformation at scale. For more information, please visit [www.ltimindtree.com](http://www.ltimindtree.com).