

PRIVACY POLICY

1. Introduction

Your privacy is important to us and we are committed to protecting your Personal Data. We have created this Privacy Policy to explain how we collect, use, share, store and otherwise process Personal Data, and how you may exercise your rights in accordance with applicable data protection laws.

2. Who We Are

Intact Business Services Private Limited ("**Intact India**", "**we**", "**our**" or "**us**") is an Indian company and forms part of the wider Intact Group. For the purposes of applicable Indian data protection laws, including the Digital Personal Data Protection Act, 2023 ("**DPDP Act**"), Intact India acts as the Data Fiduciary in relation to the Personal Data processed under this Privacy Policy.

3. What information do we collect about you?

The Personal Data we hold about you will often be collected in connection with recruitment and employment-related activities, business communications and relationship management, supplier and professional engagements, compliance requirements and other interactions with Intact India.

Depending on the nature of your interaction with Intact India, this information may include:

- Your personal details (for example, your name, date of birth, nationality and professional profile information).
- Your contact details (for example, your postal address, telephone number and email address).
- Professional and employment-related information (for example, your qualifications, skills, experience, employment history, professional certifications and career interests).
- Recruitment-related information (for example, your resume or CV, interview notes, assessment information, references, salary expectations, notice period and background verification information, where appropriate and lawful).
- Information relating to business relationships and professional engagements (for example, organisation details, job title, business contact information and information reasonably required to establish, administer or manage a business relationship).
- Financial, contractual or administrative information that may be required to establish, administer or manage contractual, supplier, payment or other business arrangements.

- Information from your digital devices and systems, such as website usage information and how you interact with our website, careers page or other digital platforms.
- Any other information reasonably necessary for recruitment and employment-related activities, business communications and relationship management, legal, regulatory and compliance purposes, security management, or the administration of Intact India's business operations.

Where you provide us with Personal Data relating to another individual, such as a referee, reference contact, authorised representative, employee, contractor, consultant, authorised signatory or other business contact, you should ensure that you have the necessary authority to share that information and, where appropriate, bring this Privacy Policy to the attention of the relevant individual.

4. Where do we collect information we hold about you?

The Personal Data we process may be collected directly from you or obtained through other lawful sources in connection with recruitment and employment-related activities, business communications and relationship management, compliance requirements, supplier and professional engagements, and other interactions with Intact India.

Depending on the nature of the engagement, we may receive Personal Data from:

- recruitment platforms, recruitment agencies and talent acquisition partners;
- employee referral programmes;
- background verification and due diligence service providers, where appropriate and lawful;
- referees and references identified by you;
- publicly available professional and business sources;
- suppliers, service providers and their authorised representatives;
- other Intact Group companies; and
- other authorised third parties involved in recruitment, business operations, compliance or professional engagements.

5. Why do we collect and use your personal data?

We process Personal Data only for purposes that are consistent with applicable law and the nature of our relationship with you. Depending on the circumstances, we may use Personal Data for one or more of the purposes described below:

- To attract, assess and recruit talent throughout the recruitment lifecycle, including the evaluation, selection and onboarding of successful candidates.

Recruitment activities may be supported by recruitment platforms, authorised service providers and business systems used to administer applications, manage recruitment workflows and facilitate candidate communications. Candidate information may also be processed through systems utilised within the Intact Group and by authorised service

providers supporting recruitment and hiring activities. While technology may be used to support recruitment administration and candidate management, employment decisions are not made solely through automated processing of Personal Data and are subject to appropriate human review and assessment.

- To communicate and engage with candidates, employees, business contacts, suppliers, service providers, professional advisers and other stakeholders, and to manage enquiries, requests, meetings, events and other business interactions.
- To establish, administer and maintain business relationships, including supplier and vendor onboarding, due diligence activities, contract and engagement management, payment administration, professional services management and the maintenance of appropriate business and corporate records.
- To protect Intact India's people, facilities, systems, information assets and business operations through appropriate information security, physical and logical access management, incident response, fraud prevention and business continuity measures.
- To comply with applicable legal, regulatory, compliance and corporate governance requirements, including maintaining statutory and corporate records, responding to lawful requests from regulators, courts and government authorities, supporting audits and investigations, and fulfilling applicable legal and regulatory obligations.
- To establish, exercise or defend legal rights and interests, obtain legal or professional advice, resolve disputes, investigate complaints or concerns, and protect the rights, interests, property and reputation of Intact India, the Intact Group and other relevant parties.
- To enhance recruitment processes, digital platforms and business operations through continuous improvement, analysis of usage and operational trends, management reporting, governance activities and business planning.

Lawful Processing

Intact India processes Personal Data only where permitted under applicable law.

Depending on the nature of the processing activity, Personal Data may be processed:

- with your consent, where consent is required under applicable law;
- for recruitment and employment-related purposes;
- to establish, administer and manage business, professional, contractual and commercial relationships;
- to comply with legal, regulatory, statutory, judicial, governance, audit, tax, accounting, risk management and compliance obligations;
- to maintain the security, integrity and resilience of Intact India's people, premises, systems, networks, applications, information assets and business operations;
- to prevent, detect, investigate or respond to fraud, misconduct, unlawful activities, cybersecurity threats, security incidents or other activities that may adversely affect Intact India, the Intact Group or other affected parties;
- to establish, exercise or defend legal rights, claims, proceedings or disputes, obtain professional advice and protect the legitimate interests of Intact India, the Intact Group and other relevant parties; or

- where otherwise permitted, recognised or required under applicable law.

As Intact India forms part of a global organisation, certain processing activities may involve international systems, service providers, support functions, group companies or cross-border transfers of Personal Data. Where such processing is subject to additional legal requirements in jurisdictions outside India, including applicable data protection requirements relating to international processing activities, Intact India seeks to process Personal Data in accordance with those requirements and any applicable contractual, organisational and technical safeguards.

Data Analytics

We may use Personal Data, together with information obtained through our recruitment processes, business interactions, digital platforms and other business activities, to support analytics, reporting and continuous improvement initiatives.

This may include using information to:

- understand and improve recruitment processes and candidate experience;
- evaluate the effectiveness of recruitment channels, sourcing strategies and hiring activities;
- improve website functionality, digital platforms and user experience;
- support business planning, operational management and resource allocation;
- prepare management information, reporting and workforce insights;
- identify operational trends, risks and areas for improvement;
- maintain the security, reliability and effectiveness of our systems and business operations; and
- detect, prevent and investigate fraud, misconduct, cybersecurity threats and other unlawful activities.

Where reasonably practicable, we seek to use aggregated, anonymised or de-identified information for analytical, reporting and business improvement purposes.

Where Personal Data is used for such purposes, Intact India seeks to ensure that the processing is undertaken in accordance with applicable law, appropriate governance requirements and the purpose for which the information was originally collected. We also take reasonable steps to ensure that the information used is relevant, proportionate and appropriate for the intended purpose.

6. Sharing of Personal Data

We will keep your Personal Data confidential and will only share it where reasonably necessary for the purposes described in this Privacy Policy, where permitted by law, or where we are required to do so by applicable legal, regulatory, contractual or governance obligations.

We may share Personal Data with the following categories of recipients:

- **within the Intact Group**, with authorised personnel and group entities where reasonably necessary to support recruitment and employment-related activities, business operations, information technology and security services, governance, audit, finance, legal and compliance functions, or other lawful business purposes;
- **with authorised service providers, contractors and professional advisers** who support our recruitment activities, technology platforms, information security programmes, background verification processes, professional engagements and other business operations;
- **with recruitment partners, referees, background verification providers and other authorised third parties** involved in recruitment, hiring and onboarding activities;
- **with suppliers, service providers, consultants, advisers and other organisations** where reasonably necessary to establish, administer or manage a business, professional or contractual relationship;
- **where required or permitted by applicable law**, including responding to lawful requests from courts, regulators, government authorities, law enforcement agencies or other competent authorities;
- **to establish, exercise or defend legal rights and interests**, obtain professional advice, investigate concerns or complaints, respond to legal proceedings, or otherwise protect the rights, interests, property or safety of Intact India, the Intact Group or other affected parties;
- **in connection with any actual or proposed corporate transaction**, including a merger, acquisition, restructuring, reorganisation, financing arrangement, transfer of business, or sale of assets, subject to appropriate confidentiality and security arrangements; or
- **where you have requested, authorised or otherwise consented** to the sharing of your Personal Data.

Where Personal Data is processed by third parties on our behalf, we seek to ensure that such parties are subject to appropriate contractual, confidentiality, security and data protection obligations and process Personal Data only for authorised purposes and in accordance with applicable legal and contractual requirements.

We do not sell Personal Data.

7. International Processing and Transfers

As part of a global organisation, Personal Data may be accessed, processed, transferred or stored by Intact Group entities and authorised service providers located in jurisdictions outside India.

Such international processing may occur in connection with the purposes described in the Section 5 of this Privacy Policy.

Where Personal Data is processed outside India, Intact India seeks to ensure that appropriate contractual, organisational and technical safeguards are implemented, having

regard to the nature of the processing, applicable legal requirements and the risks associated with the transfer or processing activity.

As certain systems, service providers and support functions operate on a global basis, international transfers or access to Personal Data may occur as part of the normal operation of Intact India's business. Where applicable, Intact India seeks to process Personal Data in accordance with relevant data protection requirements and appropriate safeguards.

8. Security of Personal Data

Intact India is committed to protecting the confidentiality, integrity and security of Personal Data. We maintain appropriate administrative, technical and organisational measures designed to safeguard Personal Data against unauthorised access, disclosure, alteration, misuse, loss, destruction or other unlawful processing.

As part of our ongoing commitment to data protection and information security, we periodically review and update our security measures having regard to the nature of the Personal Data processed, applicable legal requirements and evolving security risks.

9. How Long Will We Keep Your Personal Data?

We will retain your Personal Data for as long as we have a relationship with you and, thereafter, for as long as is reasonably necessary for the purposes described in this Privacy Policy.

Once our relationship has ended (for example, where a recruitment process has concluded, an application is unsuccessful or withdrawn, a business relationship has ended, a contract has expired, or a professional engagement has been completed), we will retain Personal Data only for as long as is reasonably necessary to:

- fulfil the purpose for which it was collected;
- maintain appropriate business, corporate and operational records;
- support audit, compliance, governance, risk management, investigation and business continuity activities;
- respond to complaints, disputes, legal proceedings or regulatory enquiries;
- comply with applicable legal, regulatory, tax, accounting, audit and record-keeping obligations; or
- establish, exercise or defend legal rights, claims and interests.

When determining the appropriate retention period, we consider factors such as the nature, sensitivity and volume of the Personal Data, the purpose for which it was collected and processed, applicable legal and regulatory requirements, and the potential risks associated with unauthorised use, disclosure or loss of the information.

Where Personal Data is no longer required, we will take reasonable steps to securely delete, anonymise or otherwise dispose of it in accordance with applicable legal, regulatory and operational requirements.

10. Your Rights

Subject to applicable law, including any limitations, conditions, exemptions or restrictions that may apply, you may have certain rights in relation to your Personal Data, including the right to:

- request information about the Personal Data we process;
- request correction, completion or updating of inaccurate, incomplete or outdated Personal Data;
- request erasure of Personal Data where it is no longer required for the purpose for which it was collected, subject to applicable legal, regulatory or contractual requirements;
- withdraw your consent, where processing is based on consent. Please note that withdrawal of consent will not affect the lawfulness of any processing undertaken before the withdrawal became effective and may affect our ability to continue certain activities or services;
- raise a grievance regarding the processing of your Personal Data; and
- nominate another individual to exercise your rights on your behalf in accordance with applicable law.

Where Personal Data is processed in circumstances that are subject to additional data protection requirements outside India, certain individuals may also have additional rights available under those laws, subject to any applicable conditions, restrictions or exemptions.

We may request information necessary to verify your identity before responding to a request relating to your Personal Data.

11. Contact Us

If you have any questions regarding this Privacy Policy, wish to exercise your rights, request information regarding the Personal Data we process about you, or raise a privacy-related concern, complaint or grievance, please contact:

Grievance Officer / Privacy Contact
Legal & Compliance Department
Intact Business Services Private Limited
11th Floor, Building 10B
DLF Cyber City, DLF Phase II
Gurugram – 122002
Haryana, India
Email: privacy@intact.net.in

We will seek to address requests, concerns and grievances relating to the processing of Personal Data in accordance with applicable law and our internal policies and procedures.

Where an individual is dissatisfied with the outcome of the grievance process, they may avail themselves of any remedies available under applicable law.

12. Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in applicable laws, regulations, business operations, technology, recruitment processes, privacy practices or other relevant developments.

The latest version of this Privacy Policy will be made available through the relevant website, careers page, recruitment platform or other appropriate communication channels.