



Human Resources Data Privacy Policy



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1. SCOPE

- 1.1. This Policy applies to all personal data about past, present and prospective employees, including candidates applying for a role, temporary and permanent employees, contractors, consultants and trainees (“you”) that is collected, maintained or used by directors, officers, managers and employees of GHCL Limited (“GHCL”) as part of an actual or prospective employment relationship. Personal data collected, maintained or used outside of the employment relationship, such as personal data arising from use of GHCL products or commercial offerings, is not covered by this Policy.
- 1.2. Nothing in this Policy is intended to form a contract of employment or otherwise. At GHCL discretion and as necessary, GHCL may amend this Policy from time to time. GHCL will notify you when updates are made.

2. GHCL APPROACH

- 2.1. GHCL value its employees and appreciate the importance of treating personal data as confidential. In this Policy GHCL outline its standards for Human Resources personal data privacy practices so that you have an opportunity to understand GHCL approach. GHCL require any directors, officers, managers and employees entrusted with your personal data as part of their job responsibility to treat it as confidential and in conformity with this Policy. GHCL will also seek to ensure that any third-party service providers GHCL use to administer its Human Resources programmes are bound to maintain confidentiality when handling your personal data on GHCL behalf, in a manner that is consistent with this Policy.

3. PERSONAL DATA CATEGORIES

- 3.1. GHCL generally process the following personal data about you over the course of recruitment or employment:
 - 3.1.1. Your biographical information, including your name, gender, date of birth, details of family members, previous job history, education details, nationality
 - 3.1.2. Your home and postal address, Home telephone number, personal email address, country of residence

- 3.1.3. Your identification numbers, including government-issued identification number or passport information
 - 3.1.4. Your performance information, including management metrics, appraisals, feedback
 - 3.1.5. Communications and internet information like your correspondence and details of internet use held on or made through GHCL systems subject to relevant restrictions under applicable law
 - 3.1.6. Payroll information, including your salary details and bank account information.
- 3.2. GHCL most often collect personal data about you directly from you in the course of your application and employment. GHCL may also use other sources, subject to restrictions under applicable law, to assist in obtaining relevant personal data about you. For example, third parties help to support recruitment, credit checks, reference and background checks, investigations of possible employee wrongdoing, and help GHCL to locate former employees and beneficiaries for purposes of administering certain benefits plans. GHCL Human Resources programmes require personal data about you to function properly. In limited circumstances some programmes may involve certain sensitive health information (e.g. medical certificates submitted to GHCL or other health-related benefits processes), financial data (e.g. payroll) or data about race or religion when mandated by local laws & regulations. Such sensitive personal data will be treated with the utmost care and in accordance with special requirements set out in applicable data protection Rules and other laws.
- 3.3. GHCL will endeavor to collect only the minimum amount of personal data required to administer its programmes and to comply with applicable employment and other relevant laws.

4. LAWFULNESS

- 4.1. Generally, GHCL process your personal data because it is necessary to do so to implement an employment agreement between you and GHCL, and where GHCL legal duties as an employer require it. In other circumstances, GHCL may process your personal data where it is necessary for us to defend, prosecute or make a claim in a court of law. GHCL may seek your explicit consent for an activity from time to time, which you may decline if GHCL ask, or revoke even after you have previously agreed, by contacting your Human Resources representative.

5. HOW GHCL USE THIS DATA

- 5.1. Your personal data may be used for the following employment-related purposes:
 - 5.1.1. To contact you and manage GHCL relationship with you, oversee compliance with policies and applicable law, assess performance, for promotions and appraisals and for training purposes
 - 5.1.2. To store emails and documents generated by you on systems that GHCL administer and make available for employment related purposes, which may contain personal data
 - 5.1.3. To manage your benefits, including administering remuneration, relocation, insurance, payroll, provident fund, superannuation fund, gratuity pensions and other employee benefits including retiral benefits and tax, including disclosure to others such as payroll providers, accountants, occupational health providers, insurers, pensions administrators, hosting service providers, govt. and statutory authorities and legal advisers
 - 5.1.4. To manage recruitment of employees, including legal eligibility for work, vetting, hires, promotion and succession planning
 - 5.1.5. To comply with policies, including in relation to claims, disciplinary actions or legal requirements and conducting investigations and incident response, including reviewing your communications in these situations in accordance with relevant internal policies and applicable law
 - 5.1.6. For security purposes, for providing IT support and for employee authentication
 - 5.1.7. To manage occupational health and absence and fitness for work and notifying family members in emergencies
 - 5.1.8. To comply with GHCL's legal obligations and to change GHCL business structure
GHCL may disclose your personal data in connection with proceedings or investigations anywhere in the world to third parties, such as public authorities, law enforcement agencies, regulators and third-party litigants. GHCL may also provide relevant parts of your personal data to any potential acquirer of or investor in any part of GHCLs' business for the purpose of that acquisition or investment
 - 5.1.9. To facilitate business travel, travel-related support including conference attendance, bookings, and emergency support services
 - 5.1.10. To conduct certain checks, such as anti-fraud checks where this is relevant to your position and in accordance with applicable law. GHCL and other organisations engaged by GHCL may access and use your personal data to conduct these credit checks and checks to prevent fraud and money laundering

- 5.1.11. To monitor equal employment opportunities, in respect of diversity categories including but not limited to age, gender, ethnicity, nationality, religion, disability, sexual orientation, and marital or family status. Such monitoring would only apply where it is either required or authorised by the specific legislation and conducted in full compliance with data protection requirements governing the use of such categories of personal data
- 5.1.12. To manage collective agreements for administering collective employee arrangements where these are in place
- 5.1.13. For internal and external auditing, assurance and risk management purposes
- 5.1.14. For statistical analysis and research purposes in the context of employment, including predictive modelling and people planning.

6. INFORMATION SHARING & TRANSFER

- 6.1. Your personal data will be shared for the purposes described in Section 5 above to the extent necessary to carry out these purposes, and as permitted by law. Note that your personal data may be processed either locally in the jurisdiction where you work or reside, or in any other jurisdiction where GHCL or its approved third-party service providers operate, worldwide, depending on the needs of the business over the course of your tenure with us, to the extent necessary and as permitted by law. Your personal data will only be shared outside GHCL Group with third parties under the following circumstances:
 - 6.1.1. Where a third-party service provider retained by GHCL is under contract to assist in administering GHCL Human Resources activities, subject to appropriate confidentiality obligations and data processing agreements, compatible with this Policy;
 - 6.1.2. In the event that the company, business or division in which you are employed is being considered for outsourcing or sale, and then only subject to contractual requirements to preserve confidentiality;
 - 6.1.3. With private or government authorities only when GHCL have determined that GHCL is required to do so under applicable laws;
 - 6.1.4. To investigate suspected fraud or illegality, to anticipate or defend legal claims; or to conclude a change of control of your company, business or division; or
 - 6.1.5. Where you have given us your prior permission to do so.

7. RIGHTS

- 7.1. **ACCESS:** You have the right to access your personal data in many circumstances, generally within 1 month of your request;
- 7.2. **RECTIFICATION:** You can ask GHCL to have inaccurate personal data amended
- 7.3. **ERASURE:** You can ask GHCL to erase personal data in certain circumstances, recognizing that GHCL must in any case respect its data retention legal obligations in the field of employment;
- 7.4. **WITHDRAWAL OF CONSENT:** You can withdraw any consents to processing that you have given us and prevent further processing if there is no other legitimate ground upon which GHCL can process your personal data;
- 7.5. **RESTRICTION:** You can require certain personal data to be marked as restricted for processing in certain circumstances;
- 7.6. **PORTABILITY:** You can ask us to provide you with a copy of your personal data in such a form that you can send it to a third party;

8. DATA SECURITY

- 8.1. Maintaining the security and integrity of your personal data is a high priority and GHCL endeavor to maintain appropriate administrative, technical, personnel and physical measures to safeguard personal data against loss, theft, and unauthorised uses or modifications. GHCL expect you to contribute to the security culture of GHCL by following appropriate security policies and procedures, completing assigned trainings, and reporting suspected incidents to relevant incident response contacts promptly.

9. DATA RETENTION

- 9.1. GHCL keep records of your personal data no longer than necessary for the purpose for which GHCL obtained them and for any other permitted compatible purposes, including compliance with legal obligations in the field of employment law. GHCL records management schedules document the applicable minimum retention periods required by local laws. GHCL use these schedules to establish the retention time periods for various categories of records that contain your personal data. Relevant employment contract retention periods in GHCL range from 6 months to 10 years from the date the employment contract ceases. If you complete the recruitment process without receiving or accepting an offer



of employment, CVs are held for a minimum of 8 weeks thereafter and, subject to your consent, for up to 1 year thereafter for future consideration.

10.CONTACTS

- 10.1. To exercise your data relating rights, or if you have questions about this Policy, please send an email to **hrd@ghcl.co.in**. If there are any updates or changes in your personal data please notify us by contacting your Human Resources representative so that GHCL can maintain its accuracy.