

## 1 Privacy Notice

### 1.1 How we use your information

#### Introduction

This Notice is a statement of how Birlasoft ("we" and "our") uses the Personal Information relating to its all associates ("you" and "your"). "Personal Information" means information about you, and from which you could be identified, including information, which may be protected under applicable privacy or data protection laws. The Personal Information relating to you, which we may collect, use, transfer, disclose or otherwise process, includes:

- **Personal details:** Name, employee/contractor/sub-cons identification number, work and home contact details (email, phone numbers, physical address), gender, date of birth, national identification number, social security number, family details, disability status, emergency contact information and photograph.
- **Documentation required under immigration laws:** Citizenship, passport data, details of residency, licences or work permit.
- **Compensation, Benefits and Payroll:** salary, bonus, benefits, pay grade, other awards, timesheets, pay data, bank account details, national insurance or other number, marital/civil partnership status, domestic partners and dependents.
- **Position:** Description of current position, job title, management category, entity name, department, location, employment status and type, terms of employment, employment contract, work history, length of service, retirement eligibility, promotions, date of transfers, and reporting manager(s) information.
- **Talent Management Information:** Details contained in job applications, learning and development, performance and development reviews and processes.
- **Risk and Independence Records:** Details of any shares of common stock, investments or directorships.
- **System Access Data:** Information required to access organization systems and applications.
- **Special Categories of Personal Information:** We may also collect certain types of Special Categories of Personal Information where required or permitted by local law, such as health/medical information, financial data.

This Notice is intended to help you understand why and how we may use your information. This list and examples above is illustrative and non-exhaustive.

Birlasoft will process your Personal Information where such processing is: (i) reasonably necessary for the performance of your employment contract; (ii) reasonably necessary for compliance with a legal obligation to which Birlasoft is subject (for example, within the field of employment); or (iii) is within Birlasoft's legitimate business interests as your employer, principally for the purposes listed below. The collection of this Personal Information by Birlasoft is usually mandatory and if it is not provided, Birlasoft will be unable to satisfy its legal obligations or perform its role as your employer. Where the collection of any Personal Information is not mandatory, Birlasoft will inform you of this prior to collection, as well as the implications of failing to provide this Personal Information.

### 1.2 Purposes of Processing Personal Information

The purposes for which we may collect, use, transfer, disclose or otherwise process your Personal Information, subject to applicable law, include:

- **Managing Workforce:** Recruitment, Background check, performance management, promotions and succession planning, salary and payment administration and reviews, wages and other benefits and bonuses, healthcare, pensions, learning and development, leave, transfers, travel, visa process, secondments, learning and development of BSL associates providing employment references, managing associates relations processes.
- **Communications, Facilities and Emergencies:** Facilitating communication with you, ensuring business continuity, providing references, protecting the health and safety of BSL associates and others, safeguarding and maintaining IT infrastructure, office equipment, facilities and other property, facilitating communication with you and your nominated contacts in an emergency. To the extent that Birlasoft processes Personal Information about the person you list as your emergency contact, you confirm that you have notified that person that he/she



is listed with Birlasoft as your emergency contact and, if necessary, provide him/her with a copy of this Notice.

- **Business Operations:** Operating and managing IT, improve internal systems, communications systems and facilities, managing product and service development, improving products and services, managing organization assets, allocating organization assets and human resources, resource management, strategic planning, project management, business continuity, compilation of audit trails (including records of changes you may make to customer accounts) and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, reorganisations or disposals and integration with purchaser.
- **Compliance:** Complying with legal and other requirements, such as income tax and national insurance deductions, record-keeping and reporting obligations, physical access policies, conducting audits, management and resolution of health and safety matters, such as accident and insurance claims, compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims, conducting investigations and complying with internal policies and procedures.
- **Associates e Monitoring:** In accordance with applicable laws and with your consent where required by law, we may monitor the use of our information technology and communications systems and the information they contain, including traffic and usage data, for purposes that may include systems maintenance, security, compliance with legal requirements and implementation of internal policies and procedures, as described in further detail in the Information Security Policy and Privacy Policy. Video footage is also being recorded on our CCTV system installed at Birlasoft's premises. We collect and process information to ensure the physical security of the people and items, security of confidential information located in Birlasoft's premises or accessible from Birlasoft's premises. This is done to prevent loss, frauds, thefts, injuries, terrorism and other events of such kind in Birlasoft's premises.

This list and examples above is illustrative and non-exhaustive.

### 1.3 Fairness and Purpose

Birlasoft will collect adequate, relevant and necessary Personal Information, and will process such information fairly and lawfully for the purpose it is collected. The purpose of collection will be specified not later than at the time of data collection, or on each occasion of change of purpose.

### 1.4 Accuracy of Information

The information held by Birlasoft shall be checked with you from time to time to ensure that it remains up-to-date. Should your personal circumstances change, you should notify the suitable function/delivery project and update your details immediately.

### 1.5 Distribution of Information

#### 1.5.1 Information Disclosure

Birlasoft does not share, sell, rent, or trade Personal Information with third parties for their sole promotional purposes or as otherwise outlined in this Privacy Notice. Birlasoft may share information with third party service providers contracted to provide services on our behalf for processing to provide your employment related services, benefits and other business purposes. These third-party service providers may only use information we provide to them as requested and instructed by Birlasoft.

- Birlasoft may disclose your Personal Information as we believe to be necessary or appropriate:
  - under applicable law, including laws outside your country of residence;
  - to comply with legal process;
  - to respond to requests from public and government authorities, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes;
  - to enforce our terms and conditions; and
  - to allow us to pursue available remedies or limit the damages that we may sustain.
- Additionally, in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection



with any bankruptcy or similar proceedings), we may transfer the Personal Information we have collected to the relevant third party.

We may share information with governmental agencies or other companies assisting us in fraud prevention or investigation. We may do so when:

- permitted or required by law; or,
- trying to protect against or prevent actual or potential fraud or unauthorized transactions; or,
- investigating fraud which has already taken place. The information is not provided to these companies for marketing purposes.

If Birlasoft goes through a business transition, such as a merger, acquisition by another organization, or sale of all or a portion of its assets, your Personal Information collected through our website(s) may be among the assets transferred. A prominent notice will appear on our website(s) after any such change in ownership or control of your Personal Information.

### 1.5.2 Cross Border Data Transfer

When conducting business activities, working on organization projects, or implementing new processes or systems, a function may require the transfer of Personal Information to other entities or third parties that are located outside of the Birlasoft operation's country of business. While permissible data transfer mechanisms are defined by applicable law or regulation, examples include:

- a data transfer agreement with the party who will access or obtain the Personal Information;
- notice to and/or approval from a country's local data protection authority; or
- notice to and/or consent from the individual whose data is to be transferred.

## 1.6 Data Retention

Birlasoft will hold your information in line with our Data Protection Policy and as per applicable law. We will only keep your Personal Information for as long as it is appropriate to fulfil the purposes for which Birlasoft collected that Personal Information, unless the law permits or requires that Birlasoft to retain it for longer (such as tax, accounting or other legal requirements).

## 1.7 Your rights in relation to your Personal Information

In certain circumstances, you may also have the right related to processing of your Personal Information. To make such a request, please use the "[data subject request form](#)" uploaded on our website <https://www.birlasoft.com/legal/privacy-policy> and submit it to [privacy@birlasoft.com](mailto:privacy@birlasoft.com). We will consider and act upon any request in accordance with applicable Data protections laws.

## 1.8 Lodge a complaint to Supervisory Authority

If you are resident in the EEA and you believe we are unlawfully processing your Personal Information, you also have the right to complain to your local Data protection supervisory authority.

## 1.9 Contact US

If you have questions or concerns about our privacy practices, or this notice, you may contact our Data Protection Officer (DPO) Amit Dhawan, by email at [privacy@birlasoft.com](mailto:privacy@birlasoft.com)

## 1.10 Updates to this Notice

This Notice may be updated periodically and without prior notice to reflect changes in Birlasoft's privacy practices. Birlasoft will let you know about any significant changes to this Notice and will indicate at the top of the Notice when it was most recently updated.

**I hereby acknowledge and accept this privacy notice.**

Associate's Signature & Date:

, 08/05/2023

Internal

*Amit Dhawan*  
11/05/23