**PRIVACY NOTICE FOR EMPLOYEES**

Luxoft India LLP (registered address: Ground Floor, Gardenia(2D) Building, Embassy Tech Village, Near New Horizon College, Devarabisanahalli, Bangalore KA 560103)and Luxoft Holding, Inc., the parent entity of Luxoft India LLP, and its affiliates ("LUXOFT") are committed to respecting your privacy and applicable privacy laws. We will only process such information as permitted by the EU General Data Protection Regulation and other applicable local laws as described below.

1. ***Legitimate interest notice***

LUXOFT has offices across the world, and operating such business involves personal data transfer across offices and countries.

LUXOFT will process your personal data to achieve a legitimate interest, including the following:

recruitment, hiring, employment, payroll, benefits, promotion, performance, management, equality in the workplace, health and safety at work, business travel, protection of an employer’s or customer’s property, your enjoyment and exercise of your employment rights, ensuring network, information and physical security in LUXOFT offices, transfer of personal data within LUXOFT group for internal administrative purposes, termination of the employment relationship.

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|  | 1. ***What personal data do we/or we may collect about you?*** | 1. ***What is the purpose of the processing?*** |
|  | **General personal information**: your name, home address, postal address, temporary address, phone numbers (home and mobile), personal email, citizenship, immigration status, age, date of birth, family status, passport and ID number, residence permit, work permit, written and electronic communications via corporate email. | The processing of this personal data is necessary to identify you as an employee and to comply with the employer’s legal obligations: to establish and perform the employment contract, to maintain or terminate the employment relationship and to enable you to perform your job, to manage data transfers between different subsidiaries and branches.  We may use your corporate email, name, position and location to inform you about corporate news, events, policies, trainings and to address you other internal communications important for the performance of your work duties. |
|  | **Identifying information:** your photo image, personal identification number and your corporate system account. | The processing of this personal data is necessary to identify you in the internal corporate systems, to provide access to LUXOFT’ s offices, management of LUXOFT’s IT systems and infrastructure, inclusion in company directories and provision of communication services such as e-mail, telephone and internet access.  Please note, that you may choose the way how we use your photo or you may objectto processing of your photo. |
|  | **Insurance information:** your national insurance details, medical insurance details, beneficiaries’ details in relation to life insurance or other benefits, emergency contacts, family status, information about family members (full name, date of birth, insurance number gender and national personal ID number), data on alimony payments and other contributions. | The processing of this personal data might be necessary for the provision of medical insurance to you and your beneficiaries, for applicable benefits, alimony payments, guarantees or relocation assistance, occupational health, retirement plans. |
|  | **Your skills:** information concerning your employment history, profession, education and skills, including: job title, previous employers, division, position, business unit, location of working place, your business contacts,referees and their contacts, professional experience, education, performance history, billing time, training records. | The processing of this personal data is necessary for recruitment, hiring and internal mobility process. Your billing time/time sheet may be available to the respective client as a part of invoice.In specific cases, and only upon the client’s request, we may show your CV to a potential client for business engagement or to current client to confirm the high level of skills of our members of staff providing the services. Such proof of quality is a key to our and our client’s businesses. The CV will only contain your name, date of birth, education history, employment history, degrees, certifications and professional skills (if any). In any event, the potential / current client is under the obligation to delete your CV immediately after the quality of our services has been confirmed. |
|  | **Payroll data:** the amount of your salary, bonuses, remuneration, social and other benefits, KPI goals and results, offer details, bank details, tax number. | The processing of this personal data is necessary to comply with the employer’s obligations: payroll, benefits, compensation and quota commission, succession management, award recognition, audits |
|  | **Security data:** CCTV records, entrance-exit time in the office, office entrance records, logs of your access and actions in the corporate internal systems, IP of your personal device (if is used for access to LUXOFT network). | The processing of this personal data is necessary to monitor your working time, protect the security of LUXOFT’s premises, assets, systems, and intellectual property and enforcing company policies, including monitoring communications where permitted by local law and in accordance with LUXOFT’s Regulations on the processing of Personal Data, Rules on Company Information Treatment by Employees, Information Security Manual, Instruction on use of corporate email Use of Corporate Electronic Mail and for investigations and disciplinary actions. |
|  | **Travel-related data:** your trip itineraries with dates and times, visa, driving licence details, current address, expense records such as: details of out of pocket expenses, corporate credit cards, company cars or private cars where an allowance is claimed and mobile phone costs. | The processing of this personal data is necessary to comply with the employer’s obligations to manage relocation, business travels, expenses and compensations. |
|  | **Performance data:** your training/testing/assessment/appraisal/survey results, risk and value assessment, information concerning your performance, career plans, conducts. | The processing of this personal data is necessary for your performance management, training and professional development. The surveys is a mood monitoring tool, which helps us to protect you and ensure your comfortable communications, |
|  | **Sensitive data:** where permitted by local law and upon your explicit consent: background checks, which include information about violation of laws or breach of company policies, where permissible. | The processing of this personal data is necessary to comply with applicable laws and protection of LUXOFT’s legitimate business interests and legal rights, including, but not limited to, performance of LUXOFT contractual obligations, to evaluate eligibility for employment and applicable benefits, to use in connection with legal claims, compliance, regulatory, investigative and disciplinary purposes (including disclosure of such information to authorities) |
|  | **Other employment data:** your vacations, medical leave information, sickness and accident records, medical certificates, workplace adjustments, other documents required to confer special benefit status, such as information concerning pregnancy status and age of children if applicable. | The processing of this personal data is necessary to comply with the employer’s obligations: vacations and sick leaves management, payroll and compensations. |
|  | Your **conflicts of interests** with LUXOFT. | The processing of this personal data is necessary to comply with the employer’s Code of conduct and Conflict of interest policy. |
|  | Data on your **shareholding** in LUXOFT. | The processing of this personal data is necessary to manage your stock plan (in case you have LUXOFT shares). |

1. ***Retention period***
   1. LUXOFT will keep this information, together with data retained from the application and selection process, for the course of the employment relationship and, to the extent permitted for legal, social security or /Tax reasons.
   2. Your personal data that we process for any purpose or purposes shall not be kept for longer than it is necessary for that purpose or those purposes. This time may vary depending on the type of the processed personal data and the purposes of processing. Notwithstanding these provisions, we will retain your personal data to the extent that we are required to do so by law.
   3. For more information on what data we need to keep and for how long post termination of employment, please contact the Data Protection Officer (see below).
2. ***Transfer of your personal data***
   1. To the extent permitted by law (e.g. if it is strictly required for the purpose of executing the employment relationship) personal data might be transferred to Luxoft Holding, Inc, its affiliates in the US and other countries, including outside the EU, and will be stored and processed manually and electronically through global systems and tools for internal administrative purposes. Before transfer your personal data to other LUXOFT entities, we take additional security measures to protect your personal data (such as entering into Standard contractual clauses, as prescribed by the EU Commission and LUXOFT Binding Corporate Rules).
   2. Access to personal data is limited and will only be allowed on a strict need to know basis. Your personal data will primarily be processed by employees of the HR, IT and finance, legal and facilities departments, where relevant and necessary. We have taken steps to ensure that there is adequate protection for your personal data in these circumstances.
   3. Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law and if required for the legal protection of LUXOFT’s legitimate interests in compliance with applicable laws.
   4. Personal data may also be shared with third party service providers, who will process it on behalf of LUXOFT for the purposes above. Here and below, references are given to the alphabetical items in the left column of the table above, such third parties include, but are not limited to, payroll service providers (e), travel agencies and travel service providers (g), relocation service providers (g), banks (e), credit card companies (e), brokers (l), medical services and medical insurance providers (c), training providers (h), survey service providers (h), testing/assessment/appraisal service providers (h),internal communication tools (a, d), investigators (k), employee hotline administrators (k), data custodians (a), current and potential clients (b, d), auditors (b, e), external consultants (b, e), IT and telecommunication operators (f), landlords and other physical security service providers (f), other external service providers, etc. Before transfer your personal data to third parties, we take additional security measures to protect your personal data (such as entering into data protection agreements or special amendments to our contracts).
   5. In the event that the business is sold or integrated with another business, your details may be disclosed to our advisers strictly on a need to know basis and any prospective purchaser’s adviser and will be passed to the new owners of the business.
3. ***Security measures***
   1. LUXOFT has taken appropriate technical, administrative, physical and procedural security measures, consistent with local and international information practices, to protect the personal data from misuse, unauthorized access or disclosure, loss, alteration, or destruction. These measuresinclude:

* *Physical safeguards*, such as locked doors and file cabinets, controlled access to our facilities, and secure destruction of media containing personal data.
* *Technology safeguards*, such as use of anti-virus and endpoint protection software, passwords.
* *Organizational safeguards*, through training and awareness programs on security and privacy, to ensure employees understand the importance and means by which they must protect personal data, as well as through privacy policies and policy standards that govern how LUXOFT treats personal data.
  1. LUXOFT will process your personal data primarily on the basis of, [Art. 6](https://gdpr-info.eu/art-6-gdpr/) para. 1 lit. b) and [Art. 6](https://gdpr-info.eu/art-6-gdpr/) para. 1 lit. f) of the EU General Data Protection Regulation. In exceptional cases, LUXOFT may also process your personal data on the basis of [Art. 6](https://gdpr-info.eu/art-6-gdpr/) para. 1 lit. a), and lit. c) to e) of the EU General Data Protection Regulation. In case of the processing of sensitive data in terms of [Art. 9](https://gdpr-info.eu/art-9-gdpr/) para. 1 of the EU General Data Protection Regulation (e.g. health data), LUXOFT will process this information on the basis of [Art. 9](https://gdpr-info.eu/art-9-gdpr/) para. 2 EU General Data Protection Regulation https://gdpr-info.eu/.

1. ***Your rights***
   1. According to the EU General Data Protection Regulation, you have the right to access, rectify and erase personal data that relates to you and in line with applicable law, to restrict or object the processing of such data. You also have the right to lodge a complaint with a supervising authority. To rectify or request access to your personal data or execute any other of the aforementioned rights please contact your Data Protection Officer at any time. There are exceptions to these rights so that access may be denied, for example, if making the information available would reveal personal information about another person or if LUXOFT is legally prevented from disclosing such information.
   2. For questions and concerns you can also contact the Data Protection Officer, Luxoft India LLP, Fourth Floor, Gardenia(2D) Building, Embassy Tech Village, Near New Horizon College,Devarabisanahalli, Bangalore- 560103, India, e-mail: [dpo-india@luxoft.com](mailto:dpo-india@luxoft.com)
2. ***Your obligations***
   1. If you intend to provide us personal data of another person (e.g. emergency contacts, beneficiaries, for insurance, relocation, conflict of interest, referral, etc.), please obtain the explicit and freely given consent of this person before such provision and to its processing.
   2. It is important that we maintain up to date records of key information on you. Please notify your HR representative of any changes in your personal circumstances as soon as they occur (e.g. change of address, marital status, and emergency contacts). From time to time we may ask you to complete a new personal information form to ensure our records are up to date.
   3. Where we require personal data to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage the employment relationship, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional.

***I hereby confirm that I have read and become familiar with the order of processing of my personal data and I have been notified of my privacy rights.***



Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Full Name: CHINNIKRISHNA DARAPUREDDY

Date: 22-05-2022

### *Consent to use of photo*

Please confirm by ticking the boxes below if you agree to your photo being used for the following purposes:

[ ] corporate directory (which all employees of LUXOFT have access to);

[ ] internal corporate correspondence;

[ ] internal communications and newsletters (to be sent to all employees of LUXOFT);

[ ] external news and media (including online media) in connection with events and updates about LUXOFT.

Please note that this is consent according to applicable data protection law in order for LUXOFT to use your photo as described herein. You have the right to withdraw your consent at any time with future effect.

Your consent is entirely voluntary and you will not be subject to any disciplinary action if you chose not to grant your consent. However if you refuse your consent, it can happen that you will not be considered in internal and external publications, as the lack of a picture could be an issue with regards to the corporate identity.

Your photo will be accessed through the software used for the corporate directory, corporate mail; furthermore for internal and external publications, worldwide marketing functions will access the photo in the corporate directory. With regards to sales employees, we deem external publication of your picture and name and professional contact information to be justified in line with your role.

Please be assured that your personal data is stored secure and safe and utilised fairly in compliance with the principles of proportionality and adequacy in particular and in general with the EU General Data Protection Regulation. Access to your data is strictly limited on a need-to-know basis. The LUXOFT data protection officer monitors the proper handling of your data.



Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Full Name: CHINNIKRISHNA DARAPUREDDY

Date: 22-MAY-2022