



Privacy Notice for Employees - India

Version History

| Date | Action Taken By | Version | Change Reference |
|---------------------------|-----------------|---------|------------------|
| 15 th May 2024 | Nirbhay Talwar | 1.0 | Initial Release |



Dear **Xebians**,

We value your privacy and are committed to safeguarding your personal information in accordance with the local privacy law or regulation around the world applicable to you and us.

This Privacy Notice for Employees (or “**Notice**”) outlines our personal data practices and gives you an overview on what we do with your information (or “**Personal information**”) and will be applicable for every Xebia entity in India, present and future.

For the purposes of this Notice, “**Xebia**”, “**we**”, “**us**” or “**our**” means the legal entity in India within the Xebia Group with which you have an individual employment contract.

1. What Info We Collect

We collect various types of Personal information about you, as part of the Xebia team. This may include the following categories of information, to the extent permitted by applicable law and your working location:

- › **Basic details** such as:
 - › Name (birth and preferred name)
 - › Gender
 - › Date and place of birth
 - › Marital status
 - › Nationality
 - › Photograph
- › **Contact details** such as:
 - › Home address
 - › Telephone number
 - › Email address
 - › Emergency contacts
- › **Financial information** relating to your compensation, benefits and pension arrangements such as:
 - › Details on your salary and any deductions
 - › Payroll information
 - › Banking details
 - › National insurance number (or the local equivalent if any)
 - › Corporate credit card usage
 - › Employment benefits
 - › Travel and relocation budgets
 - › Travel expenses
 - › Provident fund information
- › **Recruitment information** such as:
 - › Information regarding qualifications, skills, experience, etc.
 - › Background information and third-party references (if recorded)
 - › Documentation provided during immigration applications that Xebia sponsored or helped with
- › **Employment administration and career information** such as:

- › Employment and career history
- › Terms and conditions of employment
- › Residency/Work permit status
- › ID information (including social security identification if applicable)
- ›
- › Absence and attendance records, including hours worked
- › Health and safety records (if applicable)
- › Sickness and accident records
- › Performance information (including appraisals, letters of appreciation and commendation, and disciplinary and grievance procedures, including monitoring compliance with and enforcing our policies)
- › Training profile and records
- › Records of projects worked on
- › End of contract details (if applicable)
- › **Location information** such as:
 - › Recorded by electronic access (where such information is legally permitted to be collected) to Xebia buildings
- › **Asset use information** such as:
 - › Use of Xebia-owned computers and phones
 - › Use of Xebia-created accounts
- › **Sensitive personal data** such as:
 - › Anything that may reveal race or ethnic origin, religious or philosophical beliefs (such as photos or dietary requirements)
 - › Information concerning health (see employment administration and career information above for examples)
- › **Personal information we collect to make your time at the office an awesome experience** such as:
 - › Dietary requirements (where applicable)
 - › Mail delivery (only with your consent to open and forward) in some Xebia offices
 - › Family information
 - Names of partners & children
 - Birthdays of children.
- › **Biometric data** (if permitted as per applicable law) such as:
 - › Fingerprint data
 - › Facial recognition
 - › Retina scans

2. How We Obtain It

Typically, we receive your Personal information in several ways:

- › **Directly from you:** For instance, when you first apply for employment, when you use self-service updates (e.g. the online HR self-service system in use by your employing Xebia entity); any data voluntarily provided by you without our request or if you otherwise notify us of a change in personal circumstances.
- › **Indirectly from you:** For instance, when you complete certain transactions which are

logged for our purposes (e.g. when you attend an internal training course or make a staff travel booking)

- › **From third parties:** For instance, recruitment agencies or government agencies.

3. What We Do With It

The purposes for which we use your Personal information include:

- › **General Human Resources Management and Administration**, for example employee career development, performance management, compensation and benefits management, administering payroll and benefit arrangements, managing absences and equal opportunities monitoring
- › **Performance of our Business Operations**, for example carrying out day to day business activities, allowing us to work together and collaborate, providing services to our customers and ensuring business continuity
- › **Marketing, Advertising and Public Relations**, for example, with your permission, displaying employees on our website, or other professional social media websites and on other means of communication such as press releases, blogs, awards and website press releases
- › **Workforce Planning and Recruitment**, for example business forecasting, employee assignment planning and budgeting, interviewing, selecting and hiring staff
- › **Security Management**, for example to ensure the security of our premises, assets, information, employees and other personnel.
- › **Legal and Regulatory Compliance**, for example to ensure compliance with health & safety requirements, any applicable code of conduct and other legal or fiscal obligations.

4. Why We're Allowed to Do This

We will only process your Personal information where we have a legal basis for doing so and there is a legitimate purpose. Our processing of Personal information is generally because it is necessary for us to do so in connection with your employment contract. In addition, certain processing may be based on your consent (which you have the right to withdraw at any time), or because it is necessary to comply with a legal obligation or to enable us to pursue our legitimate business interests (e.g. when you sign up to a Xebia social event or register for a training session given by an external firm).

5. Who Knows About It

Within Xebia, just a few of us see your info: we restrict access to Personal information to colleagues who have a "need to know" only, including HR, Recruitment, Legal, works councils (where applicable) and health and safety committees (where applicable). For example, your manager will only have access to certain data of your Personal information for career development purposes and performance management.

Outside Xebia: We share Personal information with authorized third party service providers, such as, background verification agencies during initial employment, compensation and benefits providers, pension providers and health or retirement plan providers.

Generally, we will only disclose your Personal information in the following circumstances:

- › When required to do so by law
- › In response to a legitimate request for assistance by the police, law enforcement or other public authority

- › To provide a third party (such as a potential service provider or customer) with a means of contacting you in the normal course of business, for example, by providing your contact details, such as your business phone number and email address.

6. Where Your Info Might Go

Sometimes your Personal information might travel to other Xebia entities around the world. Whenever we transfer your Personal information (for example, outside of India), we will take all legally required steps to ensure that adequate safeguards are in place to protect your Personal information and to make sure it is treated securely and in accordance with this Policy.

7. How Long We Keep It

We keep your Personal information only as long as we actually need to fulfil the legitimate purpose, or as long as consented by you, and always in compliance with applicable laws and regulations.

8. Your Rights

You have the following rights regarding all of your Personal information we hold:

- › The right to request access to, rectification or erasure of your Personal information.
- › You may also have the right to object to or restrict certain types of processing of your Personal information and request to receive a machine-readable copy of the Personal information you have provided to us. Remember that you can add, remove or update certain information about yourself in your HR self-service system (where applicable).

Any request to exercise one of these rights will be assessed by us on a case-by-case basis, always in line with the applicable data protection legislation.

9. Talk to Us

Got questions? Please contact your HR business partner or your Privacy Champion.

Should you have any follow-up questions, feel free to contact Xebia Legal at: privacy@xebia.com.

10. Changes and Updates

We may change this Policy from time to time in order to reflect changes in the law, regulatory guidance or our data privacy practices in compliance with the law. When this happens and where required by law, we will provide you with a new or an updated notice.

Thank you for your trust.



Acceptance:

I _____ (name), resident of _____ hereby accept the terms stated in this policy and consent Xebia to process my personal information for purposes stated in this policy

Name:

Date: