

Privacy Information Management System (PIMS)

Privacy Notice for Employees

Documented Information Name: Privacy Notice for Employees

Version No: 1.2

Last Updated: 31- August 2022

Documented information Owner: Sesa Group

Approval Authority: Sesa Group

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Documented Information Management Information

Documented Information Title: Privacy Notice for Employees

Abstract: This documented Information highlights Privacy Notice for Employees.

Documented information Publication History

(All revisions made to this documented information must be listed in chronological order, with the most recent revision at the top)

Type of Information	Documented information Data
Documented information Title	Privacy Notice for Employees
Documented information Code	SESAT/ISO27701/ Privacy Notice for Employees
Date of Release	25- August 2022
Documented information Revision	31-August 2022
Documented information Owner	HR Department
Documented information Author(s)	Pricoris LLP
Documented information Change Reviewer	Pradipta Boruah
Checked By	Dileep Singh – CISO
Security Classification	Internal
Documented information Status	Final

Documented information Approver List

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Documented information Change Approver List

Version No	Revision Date	Nature of Change	Affected Sections	Date Approved
1.0	15-July 2022	Initial Draft	-	26 July 2022
1.1	24- August 2022	Final Version for approval		25- August 2022
1.2	31- August 2022	Changed the name of the document and removed form Annexure from Data Governance and Privacy Policy		03-September 2022

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Contents

1. Scope.....	4
2. Responsibilities	4
3. Privacy Notice for Employees	4
4. Definitions	9

1. Scope

All full-time employees, contract employees & prospective employees are within the scope of the notice.

2. Responsibilities

The Human Resources Manager is responsible for ensuring that this notice is made available to employees prior to Sesa Goa collecting/processing their personal data.

3. Privacy Notice for Employees

Introduction

We, at Sesa Goa are committed to safeguarding the privacy of our employees. In this notice, we explain how we will treat your personal data. This information tells you about the processing of employees' personal data by the company and any affiliate.

Which data are processed?

Type of personal data	How are the personal data obtained?	Is this a "sensitive category of personal data"? (Y/N)
Your statements about personal information and contact data: name, address, telephone number, and email address, (contact details) Date of Birth (to check whether you are a minor), Family details (for insurance purposes), photo (identification purpose)	You provide this information as part of the master data entry on the admission form.	No
Right to work/immigration data: nationality, passport data, ID data, aadhar number and information about residence or about work permit.(for identification purposes as required by law), religion (for providing data relating to diversity or availing restricted holidays), union (to provide you benefits aligned to the worker union)	You provide this either before starting the job or within the first month of employment.	No. Aadhaar number is sensitive data
Information about bank account (for payment of salaries including F&F),	You provide this either before starting the job or within the first month of employment to pay the salaries	Yes
Your personnel data: personnel number, company email address.	These data are assigned to you when you start work.	No

Travel data: company credit card number, rewards program number, purchasing, travel, and expense history.(for reimbursement of expenses)	You will receive a company credit card when you are authorized for a company card for the first time. The rewards program data and expense data are submitted by you when booking travel and submitting the reimbursement reports.	Yes
Information about health	You provide this information either with your job application or within the first month of employment (where applicable). We generate this data to ensure your suitability for work	Yes
Illness and absence data to the extent permitted by law.	We track this at the same time as the related incident/occurrence (where applicable).	Yes
Information about your academic and professional qualifications: Information about education and diplomas, continuing education, professional qualifications, information about occupational knowledge, information in application letters and resumes, and reference letters. (for background verification purposes)	You submit this data before or during your employment.	No
Account statement data, including salary, bonus, stocks and stock options, ancillary benefits and account statement information.	We generate these data during payroll processing.	No
Personnel file data: employment contract, work history, performance assessments, promotions, disciplinary measures and absences.	We generate these data for administration of your employment relationship.	No
Information about your use of IT systems: Usernames, passwords of the IT system and similar information.	We generate these data for administration of your employment relationship.	No
CCTV Footage	We generate these data for safety purposes	Yes

Retention period

We store your data for as long as this is necessary for the purpose for which the data were collected. If we find that there is no longer a need or a request for storage of your data, these data will no longer be processed and will be erased in conformity with the valid laws or internal guidelines.

Record type and retention period:

Data / Information	Retention period	Comments
Employment and Termination Agreements	Upto 80 years	There have been cases wherein data which was more than 15 years old was required.
Retirement and Pension Plan Documents	Upto 80 years	There have been cases wherein data which was more than 15 years old was required.
Records Relating to Promotion, Demotion or Discharge	Upto 80 years	There have been cases wherein data which was more than 15 years old was required.
Background verification reports	Upto 80 years	These maybe cases wherein these reports may have to be referred to. .
Accident Reports and Worker's Compensation Records	Upto 80 years	There have een cases wherein data which was more than 15 years old was required.
Salary Schedules	Upto 80 years	There have been cases wherein data which was more than 15 years old was required.
MIS Data	15 years	These may be required for reference purposes
Training Records	15 years	These may be required for reference purposes
Employment Applications	10 years	This industry requires niche skills which are difficult to acquire
Grant Applications and Contracts	Upto 80 years	There have een cases wherein data which was more than 15 years old was required.
Biometric Records	Till the day of separation +1 day	

Purposes of data processing:

Personal data

We process your personal data only to the extent permitted by law. The following table shows the purposes and legal bases by which we process your personal data.

Purpose of data processing	Justification/legal basis of processing
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Payroll and processing of benefits: Payroll and payment processing and reviews, management of wages and other benefits like stock subscription rights, granting of stocks and bonuses, health insurance, life insurance and other benefits (including veterans' pension, if applicable), social security, pension and savings plans and consideration of any other contractual benefits.	Possible basis for processing: performance of the contract with you compliance with statutory provisions and/or justified interest of the company (business operations and personnel administration)
Personnel management, benefits management, and career development: General personnel management, including evaluations, promotions, succession planning and career development, training (including distribution of company guidelines and training documents to employees), absences (including religious holidays), promotions, relocations and work assignments, execution of background checks, as mandated by law, execution of reviews using exclusion and sanction lists, as mandated by applicable law, handling of disciplinary matters and terminations, issuing reference letters.	Possible basis for processing: compliance with statutory provisions and/or justified interest of the company (business operations and personnel administration)
Management and monitoring of personnel: General control of work processes, ensuring business continuity, carrying out personnel analyses and planning, preparing for business trips, monitoring compliance with internal guidelines, including guidelines for telephone, email, internet and other company resources and other monitoring tasks as permitted by law.	Possible basis for processing: consent compliance with statutory provisions and/or justified interest of the company (business operations and personnel administration)
General personnel management, including communications and emergencies: Compiling employee directories, facilitating communication with employees, facilitating communication in case of emergency, safeguarding health and security of employees and others, protecting IT infrastructure, office equipment and other property.	Possible basis for processing: consent compliance with statutory provisions and/or justified interest of the company (business operations and personnel administration)
Business processes: Operating and managing the IT and communication systems, managing product and service development, improving products and services, managing company assets, allocation of company assets and personnel, strategic planning, project management, business continuity, compiling test logs and other reporting tools, management of records concerning production and other business activities, budgeting, financial management and reports, communication, management of mergers, acquisitions and reorganizations or disposals.	Possible basis for processing: performance of the contract with you, compliance with statutory provisions and/or justified interest of the company (business operations and personnel administration)
Compliance: Compliance with statutory or other provisions, e.g., income tax and deductions for social security, bookkeeping and reporting duties, execution of audits, compliance with state controls and other requirements by the government or other public or regulatory officials, responding to legal disputes, e.g., subpoenas, prosecution of statutory rights and legal remedies, defense in court proceedings and handling	Possible basis for processing: compliance with statutory provisions and/or justified interest of the company (business operations and personnel administration)

of internal complaints or requirements and compliance with internal guidelines and procedures.	
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Special categories of personal data

We process special categories of personal data only to the extent permitted by law. The following table shows the purposes for which we process special categories of personal data for your personal data.

Purpose of the data processing	Justification/statutory basis of the processing
Determination of whether reasonable adjustments must be made to your work regulations.	Basis for processing: <ul style="list-style-type: none"> compliance with statutory provisions and/or justified interest of the company (business operations and personnel administration)
Determination of whether you are fit to work on the shop floor	Possible basis for processing: <ul style="list-style-type: none"> justified interest of the company (business operations and personnel administration)
For the management of benefits and benefits claims for you and co-insured family members. These benefits include availing restricted holidays	Possible basis for processing: <ul style="list-style-type: none"> performance of the contract with you, compliance with statutory provisions
For compliance with disclosure duties in connection with court proceedings in which the company is involved.	Possible basis for processing: <ul style="list-style-type: none"> compliance with statutory provisions and/or justified interest of the company (business operations and personnel administration)
For compliance with disclosure duties required by law e.g. diversity data	Possible basis for processing: <ul style="list-style-type: none"> compliance with statutory provisions

Sharing personal data with Third parties

- Where required or permitted by law, personal data may be provided to others, such as regulators and law enforcement agencies.
- From time to time, we may consider corporate transactions such as a merger, acquisition, reorganization, asset sale, or similar. In these instances, we may transfer or allow access to information to enable the assessment and undertaking of that transaction.
- We may use third parties to carry out certain activities (such as external audits, etc.), to help run our business and provide you benefits (such as pension plan or health insurance schemes), to facilitate your corporate travel & expenses and to carry out background verification.
- We share information with our internal staff and our group of companies for business and administrative purposes.
- Where required for your role, your business contact details may be shared with our clients, contractors, and suppliers.

Recipients and those with access authorization

Recipient or recipient category	Purpose of data processing	What security precautions are taken for international transmission when the recipient is located outside India?
HR Department	HR Operations	Not Applicable
Finance Department	Payroll	Not Applicable
Admin department	Admin Operations	Not Applicable
IT Department	IT Operations	Not Applicable

Automated decision-making

We do not use automated profiling do not carry out any processing activities that involve automated decisions.

Your rights

You may invoke your rights to access, rectification or erasure at any time, to restrict processing, to object to processing, and to data portability. You may contact our Data Protection Officer

Definitions

- **Data**
All personal data and, where relevant, all special categories of personal data.
- **Personal data**
All information that relates to an identified or identifiable natural person; an identifiable person is someone who can be identified either directly using the data or indirectly, e.g., if this information can be linked with other information.
- **Processing**
Any handling of an employee's personal data, including (but not limited to) collecting, storing, organizing, disclosing, using, and destruction of these data.
- **Special categories of personal data**
Personal data that allows one to reach conclusions about the race or ethnic origin, political opinions, religious or philosophical beliefs or membership in a union; data concerning health or data about sexual activity or sexual orientation of a person and genetic or biometric data.