

**HCL TECHNOLOGIES GLOBAL EMPLOYEE DATA PRIVACY NOTICE ('Notice')**  
*[This Notice must be read in conjunction with your Employment Contract / Agreement]*

**Effective Date:** 15<sup>th</sup> July 2022

## **INTRODUCTION**

HCL Technologies Limited is committed to protecting and securing the privacy and confidentiality of the Personal Data that it collects from its employees, former employees, and prospective employees. This Notice outlines and explains how your Employer<sup>1</sup> and HCL Technologies Limited<sup>2</sup> (both as Joint Controllers, for the purposes of employment related processing activities and hereinafter collectively referred as 'HCL', 'we', 'our', 'us') will protect your privacy by processing your Personal Data in accordance with applicable privacy legislation(s).

Please refer to 'Annexure B' for definitions.

## **What Does This Notice Cover?**

The aim of this Notice is to provide you with information on what Personal Data we process, why we process your Personal Data, how we process your Personal Data (including details on the principles we will abide by), as well as informing you of certain rights that you may be able to exercise on your Personal Data.

This notice applies globally to all employees, subject to local caveats which have been highlighted herein or as applicable otherwise. This notice supersedes all previous employee privacy notices or privacy terms that may have been communicated to you during or prior to your employment.

This notice is supplemented by local privacy terms that may apply to your jurisdiction and are annexed to this notice, in particular pertaining to potential further data categories processed and/or processing operations rendered locally. In case of any contradiction between this notice and the local privacy terms, the local privacy terms will take precedence. Furthermore, this Notice is supplemented with and should be read in conjunction with the Global Privacy Policy.

In some cases, we may present additional Personal Data processing notices, depending on the circumstances as they may exist. Typically, these additional notices would provide requisite information pertaining to, but not limited to, additional purpose(s) for processing of your Personal Data which are not covered under this Notice. Such a notice shall apply only for those respective cases referred to therein and shall not affect the validity of this Privacy Notice.

## **What Personal Data Do We Process?**

For the purposes of this Notice, 'Personal Data' means any information about you from which you can be identified (whether derived from that information on its own or when combined with other information that we or another party may hold about you).

Prior to joining HCL, and during your employment, it may be necessary for you to provide and for HCL to collect your Personal Data which can include general and special categories of Personal Data. In compliance with applicable law(s) we may also be provided with or receive data about you from external sources like clients, third party vendors (such as recruitment agencies or background screening vendors) and online platforms if strictly required for the purposes described in this notice. For example, where permissible, we may need to receive references or conduct background checks.

---

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

## General Personal Data:

- Personal data such as: Your name, Date of birth, Country of birth and Citizenship, Nationality, Residency, Right to work, Gender, dependent data<sup>3</sup> and Marital status<sup>4</sup>, Unique identifiers issued by a government or any Local Governing body.
- Personal contact data such as: your work and personal phone number(s), e-mail address and mailing addresses.
- Financial data such as: banking information including account number, identification numbers necessary to process any employment benefit(s) as per applicable labour law(s) and/or taxation laws such as the Provident fund account number of your previous employer, pension account number, personal account number, etc., payroll information and other information related to compensation and benefits.
- Professional data such as: your educational background, work experience, professional certification details, work performance, leave of absence, IT usage records including IP addresses, in certain circumstances: working hours, time spent on certain apps on your device (such as Microsoft Teams, Outlook, Excel, Word etc.), SAP ID, login details, online identifiers, network activity metadata, browsing data, and other network and device data.
- Any other relevant information that we may require for the duration of the employment or contractual relationship.

## Special Categories of Personal Data:

HCL will only process Special Categories of Personal Data in limited circumstances and only where we are permitted to do so under applicable legislation(s). Furthermore, we are required from time-to-time to process your Special Categories of Personal Data to carry out our obligation(s) and exercise our right(s) in relation to employment law or any other law as it applies to us. HCL takes the protection and security of your Special Categories of Personal Data seriously, and the highest level of technical and organisational security controls are applied when we process your Special Categories of Personal Data.

Special Categories of Personal Data we may process include the following: Trade / worker's union or similar type of membership(s), biometric data, data concerning health or any specific medical condition and information about race / ethnicity / religion / disability / gender and self-identified LGBT status, political opinions, religious or philosophical beliefs.

For more information on how we use this data please refer to the section '[How We Use Your Personal Data?](#)'

## How We collect your Personal Data?

We may collect your Personal Data in different ways. For example, Personal Data might be collected through job application forms, CVs; data obtained from identity documents you provide to us such as your driving licence or copy of passport; from forms completed by you at the start of or during employment (such as benefit nomination, transport facility forms); from correspondence with you; from your work place activity on your HCL devices; or through interviews, meetings, survey forms, feedbacks, or other assessments related to your performance at work.

We may also collect Personal Data about you from third parties, such as information from recruitment agencies, from referring parties (internal or external), references provided by former employers, and information from employment background check providers.

---

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

## Why We process your Personal Data?

- a) We process your Personal Data for specified purposes and on the following legal grounds, for the various situations which may arise during the tenure of your employment with us:
  - i) As it may be necessary for preserving our or a third party's **legitimate interests** (please see 'How do We use your Personal Data?' section below.).
  - ii) The processing is necessary for us to perform **contractual obligation(s)** in respect of your employment or engagement with HCL e.g., process your bank details and payroll information.
  - iii) As it is, or if it becomes, necessary to comply with any **legal obligation(s)**, including but not limited to, any local law(s), to the extent of the applicability of such law(s).
  - iv) As is necessary to protect your **vital interests** when you are physically or legally incapable of giving consent; and
  - v) Data processing based on your **consent**.
- b) in exceptional circumstances, you may request us to disclose your Personal Data to third parties or organisations such as a law firm handling a data subject claim on your behalf, or otherwise.
- c) There may also be exceptional circumstances, where you may explicitly consent to the processing of your Personal Data, but only if the consent is truly freely given and unambiguous e.g., consent to publish your photograph on marketing materials.

Further to establishing valid legal ground(s) for processing your Personal Data, we also follow the principles embedded in our Global privacy Policy of data necessity, proportionality, minimisation, fairness, transparency, and others.

When you choose to provide us with Personal Data about third parties, we will only use this data for the specific reason for which you elect to provide it. HCL would process the Personal Data provided by you about your next of kin or dependents for compliance with contractual obligations or to fulfil its legal obligations. It is your responsibility to ensure that when you disclose Personal Data of individuals other than yourself, you abide by applicable privacy and data security laws, including informing individuals and third parties that you are providing their Personal Data to HCL, informing them of how it will be transferred, used, or processed. If you choose to provide HCL with a third-party's Personal Data, you represent that you have appropriate legal grounds to do so.

In accordance with the applicable laws, we may carry out automated decision-making procedures when processing your Personal Data for the purposes of preventing fraud or misuse of company information, and ensuring compliance with requirements of your employment, including to evaluate and monitor whether you have completed a training session.

## How We Use Your Personal Data?

The purposes for which we use your Personal Data include, but are not limited to, establishing, managing, and/or maintaining your employment or any other contractual relationship with HCL, including the purposes listed below:

### Compensation and Benefits:

Purpose	Legal Basis	Categories of recipients with whom we may share your Personal Data outside of HCL*
---------	-------------	--

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

Administering pay and employee rewards programs, including incentives, benefits and pay-outs, claims (insurance, travel, professional certifications et al.);	Processing is necessary to perform contractual obligation(s) in respect of your employment or engagement with HCL	<ul style="list-style-type: none"> <li>- Pension and benefit providers</li> <li>- Equity incentive plan administrators</li> <li>- Law enforcement and regulatory bodies</li> </ul>
Provision of certain social welfare-related benefits such as insurance, worker's compensation, gratuities, provident funds, social security and other benefits as defined in applicable laws	Processing is necessary to (i) perform contractual obligation(s) in respect of your employment or engagement with HCL; and/or (ii) to comply with applicable legal obligation(s)	<ul style="list-style-type: none"> <li>- Insurers</li> <li>- Third parties for any prospective mergers or acquisitions</li> <li>- IT suppliers</li> <li>- Cloud service providers</li> <li>- Payroll firms</li> </ul>
Other voluntary benefits which HCL may provide from time to time.	Processing is necessary to perform contractual obligation(s) in respect of your employment or engagement with HCL	<ul style="list-style-type: none"> <li>- External advisors e.g. Consultants, law firms, auditors</li> <li>- Occupational health providers</li> </ul>

*Talent Acquisition and onboarding:*

Purpose	Legal Basis	Categories of recipients with whom we may share your Personal Data outside of HCL *
Determining a candidate's / applicant's eligibility for employment or engagement with HCL, including, but not limited to, verification of professional references, qualifications, background checks.	Processing is necessary (i) for hiring decisions, (ii) to establish the employment relationship with you, (iii) to perform contractual obligation(s) in respect of your employment or engagement with HCL, iv) based on your consent and/or (iv) for preserving our legitimate interests in properly carrying out hiring and staffing procedures.	<ul style="list-style-type: none"> <li>- Clients and customers</li> <li>- Equity incentive plan administrators</li> <li>- Background verification entities</li> <li>- Law firms or other advisors</li> <li>- Law enforcement and regulatory bodies</li> </ul>

*HR Services:*

Purpose	Legal Basis	Categories of recipients with whom we may share your Personal Data outside of HCL *
Conducting performance reviews and appraisal evaluation	Processing is necessary (i) to carry out the employment relationship with you, and/or (ii) for preserving our legitimate interests in evaluating your work performance to support your career planning.	NA

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

Employee Training	Processing is necessary (i) to carry out the employment relationship with you, and/or (ii) for preserving our legitimate interests in developing, training and educating our employees, and/or (iii) to comply with applicable legal obligation(s).	<ul style="list-style-type: none"> <li>- Third-party training provider, if applicable</li> <li>- Cloud service providers</li> </ul>
Measuring working capability and performance improvement	Processing is necessary i) for preserving our legitimate interests in effectively allocating resources and personnel and/or ii) where applicable is based on your consent or performance of contract.	NA
Assessing any health and safety requirements (including mental health requirements) as may be required by law or industry best practises to support employees at work	Processing is required and permissible to the extent necessary(i) to carry out the employment relationship with you to the extent your role requires any such medical assessment, and/or ii) based on your consent and/or (ii) to comply with applicable legal obligation(s).	Professional consultants
Carrying out right to work checks and any appropriate HR investigations	Processing is necessary (i) to carry out the employment relationship with you, and/or (ii) to comply with applicable legal obligation(s), and/or (iii) based on your consent, and/or iii) for preserving our legitimate interests in investigating and detecting criminal, fraudulent or other non-compliant behaviour.	<ul style="list-style-type: none"> <li>- Immigration and government authorities</li> <li>- Law firms or other advisors</li> <li>- Law enforcement and regulatory bodies</li> </ul>

#### General Employee Administration

Purpose	Legal Basis	Categories of recipients with whom we may share your Personal Data outside of HCL*
Processing, recording and maintenance of the working times	Processing is necessary for preserving our legitimate interests in effectively managing resources and maintaining business operations.	NA
Creation and maintenance of personnel files	Processing is necessary (i) to carry out the employment relationship with you, and/or (ii) to comply with applicable legal obligation(s)	<ul style="list-style-type: none"> <li>- Data Deletion and retention vendor(s)</li> <li>- Cloud service providers</li> <li>- Law firms or other advisors</li> </ul>

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

		<ul style="list-style-type: none"> <li>- Law enforcement and regulatory bodies</li> </ul>
Leave management including vacation planning	Processing is necessary to (i) perform contractual obligation(s) in respect of your employment or engagement with HCL; and/or (ii) to comply with applicable legal obligation(s) and/or iii) based on your consent and/ or iv) for preserving our legitimate interests in effectively managing resources and maintaining uninterrupted business operations.	<ul style="list-style-type: none"> <li>- Client(s) who are directly impacted due to employee's absence</li> <li>- Cloud service providers</li> <li>- Law firms or other advisors</li> <li>- Law enforcement and regulatory bodies</li> </ul>
Exit management	Processing is necessary to (i) perform contractual obligation(s) in respect of your employment or engagement with HCL; and/or (ii) to comply with applicable legal obligation(s) and/or iii) based on your consent and/or iv) for preserving our legitimate interests in effectively managing resources and maintaining uninterrupted business operations.	<ul style="list-style-type: none"> <li>- Client(s) who are directly impacted due to employee's exit</li> <li>- Cloud service providers</li> <li>- Law firms or other advisors</li> <li>- Law enforcement and regulatory bodies</li> </ul>
Enabling general IT Systems Usage	Processing is necessary to (i) perform contractual obligation(s) in respect of your employment or engagement with HCL; and/or (ii) to comply with applicable legal obligation(s) and/or based on your consent or for preserving our legitimate interests in successfully enabling employee to operate	Cloud service providers

**Management and operation of HCL business:**

Purpose	Legal Basis	Categories of recipients with whom we may share your Personal Data outside of HCL*
Strategic planning and operational restructuring analysis including mergers and acquisitions with HCL legal entities or external organizations	Processing is necessary for preserving the interests of HCL as an organisation and of the employees in effectively allocating resources and personnel as	<ul style="list-style-type: none"> <li>- Third party organisations such as independent survey hosting companies, business consultants, Visa, Immigration and travel and</li> </ul>

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

	well as improving efficiency, work conditions, expanding and enriching HCL's service delivery model etc.	accommodation service providers etc
Building resource and capability management		
Conducting organizational surveys, research, and analysis		
Employee Transfer and Travel Management	Processing is necessary (i) to carry out the employment relationship with you to the extent your role requires travel, and/or (ii) is based on your consent and/or (iii) for preserving our legitimate interests in work related travel arrangement in exceptional cases.	
Threat intelligence and security monitoring	Processing is necessary to (i) perform contractual obligation(s) in respect of your employment or engagement with HCL; and/or (ii) to comply with applicable legal obligation(s) and/or for preserving our legitimate interests in protecting our network and data	<ul style="list-style-type: none"> <li>- Cloud service providers</li> <li>- Forensic analysis service providers</li> <li>- Law firms or other advisors</li> <li>- Law enforcement and regulatory bodies</li> </ul>

Please note, for the purposes of enabling general IT Systems, network management, IT and application support services, general employee administration, compensation, and benefits services etc., HCL Technologies Ltd. acts as a Processor for all its group affiliates.

\* In some circumstances these third parties may qualify as controllers who process your Personal Data for their own purposes e.g., in the case of transferring your Personal Data to benefit or pension providers and to worker's council if required under any applicable employment law. Please refer to these controllers' privacy notice or statement. Otherwise, all third parties are processor acting on the instruction of HCL. Wherever we engage a processor, we require assurances that such processors have implemented appropriate safeguards and controls in relation to the protection of your Personal Data. In addition to the third parties' legal obligations, we require that such third parties are also contractually obligated to safeguard your Personal Data. Ongoing oversight is maintained on the relevant processing activities being carried out by the third party.

### Workplace Monitoring

HCL may, subject to applicable laws and regulations, monitor your use of the HCL computer systems and networks including your physical location whilst you are operating in the workplace to ensure the correct functioning of the systems and networks, and to protect the misuse and threat of attacks, regulatory compliance, prevent the commission of crimes and violations of laws and policies, ensure HCL's compliance with software licensing and agreements, prevent theft or unauthorised disclosure of HCL intellectual property, assets or confidential information, assessing compliance with, and detecting potential violations of HCL policies and any applicable laws and regulations.

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

These activities will be conducted to the extent necessary in order (i) to fulfil our legitimate interests in safeguarding a secure and compliant rendering of HCL's business operations and will be reasonable and proportionate to secure and safeguard the interests of its employees, clients, property, and other associated parties, (ii) to carry out the employment relationship with HCL Personnel, in particular to ensure HCL's policies and procedures are adhered to by all HCL Personnel at all times and/or (iii) to comply with applicable legal obligations. For the abovementioned purposes we may undertake the following monitoring activities:

- Surveillance of workplace premises using Closed-Circuit Television cameras (CCTV) in designated areas only as permitted by local laws. CCTV recordings are generally only stored for 30 days unless there is a specific legal or contractual obligation to store the recordings for more than 30 days and such requests are assessed on a case-by-case basis.
- We may monitor and in limited cases review communications sent to or received by HCL employee(s) or contractor(s) through HCL's assets, network, or corporate mailing / e-mail system, but only in situations where there is credible evidence establishing reasonable threat to the safety and security of our network and systems.
- Reviewing documents or contents created, reviewed, stored, or processed on HCL systems, devices, and networks.
- Reviewing cookies and/or temporary files placed on HCL systems, devices, or networks so to preserve the sanctity and integrity of HCL network and its associated network assets; and
- To ensure continuous safeguarding of HCL's network and its assets we run programs and security tools such as Data Loss Prevention and system scanning etc. wherein data may be monitored in real time and analysed for threat intelligence and forensic purposes. Data points such as internet browsing history activities performed using HCL systems, devices, and networks; logs related to usage of HCL devices and systems, metadata etc will be processed for security purposes.
- Under specific contractual obligations and where permissible under the law, we may be required to implement tools for measuring time spent on productive (business related applications and tools) vs non-productive applications. The information collected will then be used to align resources and identify any improvement opportunities for tools and applications as well any need for trainings. Appropriate notices and user privacy controls are put in place when implementing such monitoring tools.

Please note that from time-to-time we may issue separate privacy notice(s) to you when we process of your Personal Data in relation to workplace monitoring. Such additional notices shall be supplemental to this Notice.

### **How Long Do We Retain your Personal Data?**

We retain your Personal Data for as long as it is necessary to fulfil the purposes for which it is processed that is for the duration of your employment. Post-employment your data will not be kept longer than necessary for the purpose for which it was processed. For example, we may need to retain your Personal Data to comply with employment, Tax, and other applicable Laws, for audit purposes and to exercise or defend any legal claims.

We follow a deletion process designed to ensure that your Personal Data is safely and completely removed from our network or retained only in anonymized form. We try to ensure that we protect your

---

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.



information from accidental deletion. Because of this, there could be some delay between when data deletion is initiated and when data is deleted from our active and backup systems / network / servers et al.

### **Is Your Data Transferred Across International Borders?**

HCL is a truly global organisation so your Personal data may be transferred for the any of the above stated purposes to different global locations. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

If it is necessary to transfer your Personal Data from your habitual place of residence to countries that do not offer adequate protections, then we will ensure that appropriate safeguards as required by applicable laws are put in place prior to the transfer of the data. For example by incorporating standard contractual clauses (more information about such clauses is available [here](#)) or Binding Corporate Rules (BCRs) into contract(s) / data transfer agreement(s) established between the parties transferring the Personal Data and a copy of which can be requested by registering your request at [Data Subject Request Portal](#).

### **What are your rights and how can you exercise them?**

Depending on your relationship with HCL you may have several rights in relation to your Personal Data. Please refer to the [Annexure A](#) for information on data subject rights. Please note, these rights are subject to exemption(s) and may not apply in all circumstances. If you wish to exercise these rights, then HCL will provide you with the requested information or action your request within one month after receipt of your verified request, subject to any extensions that maybe required and communicated to you.

You can use the following channels to exercise your rights or request more information about your rights

- Submit your requests on the [Data Subject Request Portal](#) which can be accessed via MyHCL (App Central → Beyond Work) or on HCLTech.com (via Online Privacy Statement accessible via link at the footer of each webpage).
- Alternatively, you can contact HCL's Privacy Office via [privacy@hcl.com](mailto:privacy@hcl.com) if you have any general query.

### **How Do We Safeguard your Personal Data?**

We implement and maintain appropriate technical, organizational, and physical security measures to protect your Personal Data and these security measures are in line with industry best practices.

The security control in place includes, but are not limited to:

- Access to data based on need to know and least privilege principle to ensure data is not accessed except by authorized individuals for performance of their duties.
- Layered security controls ranging from perimeter security to end user machine level controls such as Firewalls, Spam protection, Antivirus and Spyware solutions, security awareness trainings and incident management etc.
- To further reduce the risk associated with data processing, we make use of pseudonymisation / Anonymisation techniques where suitable
- Using encryption mechanisms, where appropriate such as email encryption, encryption of data during transfer, secure VPN access and disk/file level encryption etc.

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

- Third parties that process Personal Data on our behalf, do so based on written instructions and are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **What if you do not provide Personal Data?**

In certain circumstances, you may have an obligation to provide HCL with Personal Data, in particular certain information, such as contact details, education, and professional experience details, financial details, and your right to work in a particular jurisdiction, to enable HCL to enter into a contract of employment with you.

You may also have to provide HCL with Personal Data to avail services and benefits provided to you as part of employment. Certain information may be necessary to fulfil legal obligation under employment, Tax and other applicable laws and regulations and to exercise your statutory rights. In addition, you are required to notify us when you are absent from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith.

If you do not provide the necessary information, this will impact our ability to manage the rights and obligations arising because of the employment relationship effectively.

### **How Do We Update This Notice?**

We may update this Notice from time to time. We will post any updated version of this Notice on the HCL intranet and other relevant portal(s). We may also communicate changes to this Notice to you by email or by other necessary mean(s), if need be.

Except as otherwise stated in this Notice, any updates to this Notice will be effective from the date on which they are communicated to HCL personnel.

### **Who can you contact?**

Any questions or concerns about the operation of this document should be addressed to the relevant HR personnel / HR Employee Partner.

If you have any questions or concerns about how your Personal Data is processed then you can contact the Global Privacy Office at [privacy@hcl.com](mailto:privacy@hcl.com) or alternatively you can contact HCL's Data Protection Officer at [hcldpo@hcl.com](mailto:hcldpo@hcl.com)

If you are an employee from India, and you have any concerns about how your Personal Data is processed then you can contact the Grievance Officer for India (Prashant Yadav) at [grievance-india@hcl.com](mailto:grievance-india@hcl.com)

### **Complaints**

We want to address any concerns you have so please contact us in the first instance. You have a right to lodge a complaint with a data protection supervisory authority in the jurisdiction of your habitual residence, place of work or place of the alleged infringement.

---

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

---

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

## Annexure A

### Data Subject Rights:

Your rights may differ depending on local laws applicable, but generally (as far as applicable laws provide you with such rights). You would be entitled to: object to the processing of Personal Data, access your data and have inaccurate data corrected, obtain a copy of your Personal Data (in some cases in portable format), ask us about any relevant details of processing, ask for erasure or restriction of processing, and to lodge complaints with relevant authorities (in particular in the country where you live, work or where the alleged infringement took place). These rights can be summarised in broad terms with the EU General Data Protection Regulation as a baseline:

- **Right of Access**  
You have the right to confirm with us whether your Personal Data is processed, and if it is, to request access to that Personal Data including the categories of Personal Data processed, the purpose of the processing and the recipients or categories of recipients. We can only provide you with your Personal Data, not Personal Data about another person. Also, where access would adversely affect another person's rights, we're not required to provide this. Due to legal privilege, there are some records we are not able to share in connection with a claim or legal proceeding.
- **Right to Rectification**  
You may have the right to rectify inaccurate or incomplete Personal Data concerning you. We encourage you to review this information regularly to ensure that it is accurate and up to date.
- **Right to Erasure (right to be forgotten)**  
You may have the right to ask us to erase Personal Data concerning you. The right to erasure does not apply where your information is processed for certain specified reasons, including for the exercise or defence of legal claims.
- **Right to Restriction of processing**  
In certain situations, you have the right to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their Personal Data to be 'blocked' to make sure the restriction is respected in future. This may affect our ability to provide services to you.
- **Right to Data portability**  
You may have the right to receive Personal Data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format and you may have the right to transmit that data to another entity.
- **Right to Object and rights relating to automated decision-making**  
Under certain circumstances you may have the right to object, on grounds relating to your situation, at any time to the processing of your Personal Data, including profiling, by us and we can be required to no longer process your Personal Data. This may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.

You are entitled to receive your Personal Data free of charge except in the following circumstances where we may charge a reasonable fee to cover our administrative costs of providing the Personal Data for:

- manifestly unfounded or excessive/repeated requests, or
- further copies of the same information.

---

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

To exercise any of the above mentioned rights please submit your request through our [Data Subject Request Portal](#).

#### Annexure B – Definitions:

Applicable Law	Local laws applicable to HCL.
<b>Anonymisation</b>	The process of either encrypting or removing personal data from a database, so that the individuals whom the data describe remain anonymous. This is done for the purpose of protecting individuals' private activities while maintaining the integrity of the data gathered and shared.
<b>Automated decision making</b>	Subject to local applicable law, every data subject has the right not to be subject to a decision which produces legal effects concerning him or significantly affects him and which is based solely on automated processing of data intended to evaluate certain personal aspects relating to him.
<b>Consent</b>	Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
<b>Controller</b>	The entity/person who (either alone or jointly or in common with other entities/persons) determines the purposes for which and the way any Personal Data are or are to be processed.
<b>Data Processing</b>	Any operation or set of operations which is performed on personal data, such as collecting, recording, organizing, storing, adapting, or altering, retrieving, consulting, using, disclosing by transmission, dissemination or otherwise making the data available, aligning or combining data, or blocking, erasing or destroying data. Not limited to automatic means.
<b>Data Retention</b>	The policies and processes used within HCL for determining the time for archiving and storing of personal data.
<b>Data Subject</b>	Any identified or identifiable living individual natural person.
<b>Employee</b>	The natural person who is either acting in a permanent or on contractual capacity, to perform the purpose of a specific work assigned by employer and bound by a contractual or an employment agreement.
<b>Employer</b>	The local entity which offers employment and/or is demarcated as employer on the employment agreement signed by the employee.
<b>Encryption</b>	The method by which plaintext or any other type of data is converted from a readable form to an encoded version that can only be decoded by another entity if they have access to a decryption key.
<b>Joint Controller</b>	Where personal data is processed by two or more controllers who jointly determine the purpose and means of processing, they are termed as joint controllers.
<b>Personal Data</b>	Any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to an

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

	identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural, or social identity.
<b>Processor</b>	Any person or an entity who processes the data on behalf of the Controller.
<b>Profiling</b>	Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location, or movements.
<b>Pseudonymisation</b>	The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
<b>Special Categories of Personal Data</b>	Any Personal Data revealing race or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
<b>Supervisory authority</b>	Independent Authority or division associated with an Authority in any relevant jurisdiction, whose primary purpose and function is to regulate matters related to personal data.
<b>Third Party</b>	A natural or legal person, public authority, agency, or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## Annexure C

The following annexure provides, for reference, a non-comprehensive list of personal data attributes that HCL may need to process for effectively managing the employment relationship. The type of personal data processed may vary depending on processing activity and from one jurisdiction to other.

### General Identification and Contact Data

Name	Nationality	Date of Birth	Birth Certificate
Home Correspondence Address	Right to work authorisation	Employee ID	Marriage Certificate
Contact Number	Dependent Data	Phone Number	Vehicle ID Number (VIN)
Country of Birth	Marital Status	Gender	Mother's Maiden Name
Citizenship	Email Address	Death Certificate	

### Professional Data

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.

Educational background	Performance Related Details	Service Letter	Leave of Absence Data
Work Experience	Information within Resume/CV	Payslips	Professional Certificate Details

#### Government-Issued Identification Numbers and Data

Driver's License Number	Military ID Number	Passport Number
National Identification Number	Social Security Number (US only)	Tribal Identification Number
Employer ID Number (EIN)	State Identification Number	Tax Identification Number (TIN)

#### Financial Data

Credit Card Number	Tax Information	Bank Statements
Debit Card Number	Policy Number	Pension Details
Financial Account Number	Bank Account Number and Details	Personal Account Number

#### Sensitive/Special Categories of Personal Data

Civil or Criminal Information	Sexual Orientation	Racial or Ethnic Origin	Medical Procedures
Education Records	Trade Union Membership	Prescription Drug Information	Employment Records/Compensation
Religious Beliefs	Digital Signature	Medical History	Political Opinions
Current or former physical, mental, or medical conditions			

#### Technical Identifiers

IP Address	User ID or Username and Password	Geolocation	Security Tokens	Device Identification Number (e.g., IMEI, MAC Address)
------------	----------------------------------	-------------	-----------------	--

#### Biometric Identifiers

Fingerprint(s)	Genetic	Retinal or Iris Scan	Voice Print	Photographic Facial Images or Facial Geometry
----------------	---------	----------------------	-------------	---

#### Other Information

Any other information not listed above but constituting as personal data
--

<sup>1</sup> Employer: The local HCL entity which is your employer as per your employment contract / agreement

<sup>2</sup> HCL Technologies Ltd. Corporate Headquarters: Technology Hub, SEZ, Plot No. 3A, Sector 126, Noida – 201304, India

<sup>3</sup> Please note this personal data element is only collected in a limited number of countries and not globally

<sup>4</sup> Please note this personal data element is only collected in a limited number of countries and not globally. Dependent details are referred to personal data of your kin such as your family members.