



**Invesco India Private Limited**

## **Employee Data Protection Policy**

**Version: 1.2**

**Effective: December 31, 2018**

Last updated: October 1, 2020



## Employee Data Protection Policy

### 1. Purpose

In accordance with Invesco's Privacy Policy, Invesco India Private Limited ("I IPL") attaches great importance to protecting an individual's right to privacy in relation to personal data and is committed to complying with the Information Technology Act, 2000 including the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 and other laws applicable to data protection in India ("**Data Protection Laws**")

The Invesco Privacy Policy may be referenced ([here](#)) and applies to all Invesco employees and all forms of personal data processed by Invesco.

This Employee Data Protection Policy sets out the processes and framework within which I IPL shall collect, access, use, store, transfer, retain and protect a specific subset of personal data called **Sensitive Personal Data and Information ("SPDI")** in accordance with the Data Protection Laws.

### 2. Scope

This policy applies to the SPDI of all employees, contractors, temporary employees, consultants, interns, trainees, prospective employees or applicants, and former employees of I IPL (hereinafter collectively referred to as "**Individuals**") and should be read in conjunction with other HR and related policies of I IPL & Employment Contract.

### 3. Definition of SPDI in Data Protection Laws

SPDI under the Data Protection Laws, means personal information which consists of information relating to the Individual's

- Password
- Financial information such as bank account or credit card or debit card or any other payment instrument details
- Physical, physiological and mental health condition
- Sexual orientation & gender identity
- Medical records and history
- Biometric information
- Any detail relating to the above clauses as provided to a corporate entity for providing services
- Any information received under the above clauses for storing, processing under lawful contract, or otherwise.

Any information that is freely and lawfully available, accessible in public domain, or furnished under any laws of the land shall not be regarded as SPDI for the purpose of this policy.

#### **4. SPDI Guidelines & Procedures**

I IPL will observe the following guidelines & procedures regarding SPDI:

##### **4.1 Purpose and Manner of Collection of SPDI**

I IPL will collect SPDI with prior consent of the Individual by lawful and fair means. The SPDI collected from Individuals for carrying out any function of the Company including but not limited to: assessing an individual's qualifications and suitability including state of health for a particular job or task, administering a range of HR processes, provisioning of payroll benefits, record retention process, performance management, matters of discrimination, staff action on career development, tax-return filing, disclosure as permitted and required by law to assist in any regulatory, audit or other investigation or inspection or internal audit procedure and / or other administrative tasks (hereinafter collectively referred to as "Purpose")

SPDI may further be used for the purposes of verification of identity, prevention, detection or investigation of offences including cyber incidents and prosecution and punishment thereof.

##### **4.2 Consent for SPDI**

I IPL shall obtain consent of the Individual for the collection of their SPDI.

##### **4.3 Use, storage and retention of SPDI**

I IPL will use SPDI for the purpose for which it is collected. The SPDI will not be kept longer than is necessary as per applicable laws.

##### **4.4 Reasonable security practices for SPDI**

I IPL will use appropriate technical and organizational measures to ensure that the SPDI is protected against unauthorized or accidental access, processing, erasure or other use. Appropriate security practices and procedures will be taken as mandated under the applicable laws and in accordance with Invesco's Information Security Policies.

##### **4.5 Disclosure and Transfer of SPDI**

I IPL at its absolute discretion may disclose and/or transfer SPDI (whether in or outside of employing country) to its group companies, affiliates or associate companies, or third-party service providers such as insurers, bankers, administrators and other third party companies engaged in contractual activities on I IPL's behalf who are bound by similar level of data protection guidelines either under the law or contract.

I IPL may disclose SPDI to a third party (not covered above) only after obtaining consent from the Individual, unless such disclosure is required by the government, regulatory authorities, court order or is otherwise mandated under law.

##### **4.6 Individual's right to Access to SPDI**

Under Data Protection Laws, an Individual has the right of access to the SPDI he/she has provided.

The Individual will also have a right to request a copy of the SPDI held by I IPL. If the Individual would like to seek further information on how I IPL uses the Individual's SPDI, then such information may be sought from the Human Resources department.

#### 4.7 Individual's right to correction and updating of SPDI

Under Data Protection Laws, an Individual is entitled to request correction of its SPDI if it is evident that the data held, is inaccurate.

In cases of SPDI correction or updating, there should be sufficient evidence to support the correction, e.g., where there are any changes in the Individual's SPDI (such as changes to financial information, medical conditions etc.)

An Individual who is an existing employee of IIPL is required to notify Human Resources department in writing or by email as soon as the changes arise and submit a copy of the supporting SPDI which reflects the corrected or updated status.

#### 4.8 Opt Out of provision of SPDI

An Individual has the option to not consent to provide SPDI sought to be collected by IIPL.

In addition, the Individual at any time while employed by IIPL or otherwise, also has an option to withdraw their earlier consent to provide SPDI. Such withdrawal of the consent shall be sent in writing or by email to your HR Business Partner.

It is important to note that provision of certain SPDI to IIPL is necessary in IIPL's organizational, legal, regulatory or other obligations in running its business and is also necessary for the performance of its employment or other contract with Individuals.

In cases wherein the Individual does not consent to provide certain required SPDI or later on withdraw of their consent, IIPL has the option to not provide employment or services for which the said SPDI is required.

The table below outlines the possible implications of non-consent or withdrawal of consent to provide SPDI at IIPL.

Type of SPDI	IPL Employment Context	Implications for Non- consent or withdrawal of consent
Financial Information	IIPL requires provision of certain financial information necessary to conduct IIPL employment, services or other contractual relationship with an Individual, including but not limited to: bank account, credit card, tax reference or other financial information.	If required information is not provided or later withdrawn, IIPL may no longer be able to continue to provide employment or services to the Individual.
Physical, physiological and mental health condition	IIPL may require this information for the purposes of carrying out obligations in the field of employment or is necessary to assess the Individual's working capacity and where necessary, provide appropriate support.	If required information is not provided or later withdrawn, IIPL may no longer be able to continue to provide employment or services to the Individual.
Medical Records & History	IIPL may require this information for the purpose of carrying out obligations in the field of employment or is necessary to assess the Individual's working capacity and where necessary provide appropriate support.	If required information is not provided or later withdrawn, IIPL may no longer be able to continue to provide employment or services to the Individual.

Sexual Orientation & Gender Identity	IIPL is not required to capture this this data, however an Individual may independently choose to share this information with IIPL.	No implications - provision of such information would be voluntary on the part of the Individual.
Password	IIPL do not request or collect or store Individuals' passwords for any non-Invesco systems.  Passwords for Invesco systems are provided by Invesco to the employee for use of Invesco business systems only and therefore deemed out of scope as SPDIs. Please refer to Invesco's Acceptable Use Policy for further information.	No implications - IIPL does not request or store passwords for non-Invesco systems.
Biometric Information	IIPL may require this information for the purpose of providing Corporate devices & Access rights/control.	If required information is not provided or later withdrawn, IIPL may no longer be able to continue to provide employment or services to the Individual.

#### 4.9 Dispute Resolution for Employees

IIPL has appointed a Grievance Officer for addressing the grievances of Individuals in connection with SPDI and data privacy. Individuals can raise the grievance/s to the attention of the Grievance officer by emailing to [spdi.iipl@invesco.com](mailto:spdi.iipl@invesco.com)

#### Version History Document

Version	Date	Description	Initiator/ Revisionist	Approved by
1.0	December 28, 2017	Policy effect date	Prashanth Narva	Mamata Vegunta
1.1	December 31, 2018	Revision of definition, purpose and process	Prashanth Narva	Mamata Vegunta
1.2	October 1, 2020	Added Gender Identity which may be volunteered by employees as part of Diversity Data collection. This has been placed with the existing parameter of Sexual Orientation.	Prashanth Narva	Mamata Vegunta



Dear Colleague,

Please read the following statement in conjunction with the Employment Data Protection Policy and confirm your understanding and acceptance by signing and returning the statement to Human Resources department.

**Sensitive Personal Data or Information (SPDI) Collection Statement**

Throughout the course of your employment or service with Invesco India Private Limited ("IIPL"), we may collect certain Sensitive Personal Data or Information ("SPDI") from you.

The purpose of collection of SPDI includes but is not limited to: assessing an individual's qualifications and suitability including state of health for a particular job or task, administering a range of HR processes, provisioning of payroll benefits, record retention process, performance management, staff action on career development, tax-return filing, disclosures as permitted and required by law to assist in regulatory or other investigation or inspection, if any, or internal audit procedure and / or other administrative tasks ("Purposes").

The SPDI that we have collected and may collect from time to time may be used for the Purposes listed above by IIPL and/or may be transferred (whether in or outside of your employing country) to our group, affiliate or associate companies, our third party service providers such as insurers, bankers, administrators and other third party companies engaged in contractual activities on our behalf.

As per IIPL's Employment Data Protection Policy, we reserve the right to retain SPDI of employees, contractors, temporary employees, consultants, interns, trainees, prospective employees or applicants, and former employees when they cease to be employed by us for a period as allowed under applicable laws. Such SPDI may be required for any purposes, residual or ancillary to the above Purposes in relation to a former employee, including, but not limited to; the provision of job references, processing applications for the employment matters relating to retirement benefits and allowing us to fulfill other contractual or statutory obligations. Please note that you have a right to request access to or seek a correction to your SPDI in relation to your employment.

Please visit the intranet for our latest Employment Data Protection Policy should you have any enquiries concerning the SPDI collected, including obtaining copies and/ or seeking any correction. Please note that the Employment Data Protection Policy may be updated and revised periodically without notice.

By signing below, you agree and confirm your acceptance of the Sensitive Personal Data or Information Collection Statement and acknowledge that you have read and agree to the terms of the Employment Data Protection Policy. You have the right to opt-out, in which case, you may contact the Human Resources department

Read and Acknowledged by:

Signature:

Name:

Date: