Dear Employee,

Sub: Data Protection;

The Company’s Data Privacy Notice, summarises how we protect your data, our usage of that data and other relevant information. For example, we set out in the attached Data Privacy Notice how we as an organisation collect, use, store, transfer and secure personal data.

When processing data, we have determined that consent is not a necessary basis for the processing of personal data for our day-to-day management of the employment relationship between the company and its employees. Hexaware Technologies will rely on the following grounds to process the personal data: -

**1. Where we need to perform the contract we have entered into with you.**

For example, Hexaware needs to have the freedom to perform the Company’s obligations under the employment contract as will be common for any employer for processing personal data. In any case, the Company’s employment relationship with its employees (or other types of contracts, e.g. consultancy contracts with our contractors) are governed by the terms and conditions of those contracts. Many of the other general rules of our organisation are covered in part in handbooks and policies to which employees are subject by virtue of the contractual obligation in their contracts. e.g. in respect of health and safety at work and I.T. Policies.

Non-exhaustive examples where this ground, is in our determination appropriate, include providing, controlling and processing:

* Home address details for communication
* Bank details to pay salary or fees under the relevant contract
* Next of kin for life assurance and other relevant benefits
* Details of previous employer for reference purposes
* Personal details to arrange directors' and officers' insurance for a director.

**2. Where we need to comply with a legal obligation.**

Under this ground, Hexaware’s processing is necessary for compliance with legal obligations in the countries to which we, as an employer, might be subject to. In the employment context, this could be relevant to pre-employment vetting, performance of the employment contract (overlapping with the above ground), and compliance with legal obligations owed by Hexaware to a third party. Examples might include:

* Pre-employment vetting of the right to work in the countries of our business intrests to comply with the relevant regulations and immigration laws to prevent illegal working and to carry out right to work checks on all prospective employees.Dealing with local tax authorities and other relevant authorities
* Pre-employment vetting for example in the financial services industry

**3. Where it is necessary for our legitimate interests (or those of a third party).**

Examples are set out in the attached Data Privacy Notice but include: -

* The usual and expected processing of personal data to maintain the employment relationship
* To protect Hexaware’s proprietary and commercially sensitive information and to comply with its confidentiality obligations to its clients
* Processing for direct marketing purposes or preventing fraud
* Transmission of personal data within a group of undertakings for internal administrative purposes, including client and employee data (note: international transfer requirements will still apply)
* Processing for the purposes of ensuring network and information security, including preventing unauthorised access to electronic communications networks and stopping damage to computer and electronic communication systems
* Reporting possible criminal acts or threats to public security to a competent authority
* sharing of personal information when required for the business needs with our business partners associates, customers and suppliers

We may also use your personal information in the following situations:

**4. Where we need to protect your interests (or someone else’s interests).**

**5. Where it is needed in the public interest or for official purposes.**

If you have any further questions on this matter, please contact the HR Team in the first instance.

Thank you for your assistance.

Yours sincerely,