

Employee Privacy Notice

At IAVI INDIA, we take great care in processing personal data in compliance with The Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures And Sensitive Personal Data Or Information) Rules, 2011 as applicable (hereinafter, as “Data Protection Laws”). We only collect and use the information necessary to achieve the purposes described below. Your data will be treated in accordance with this Privacy Notice at all times.

Why this privacy notice?

IAVI INDIA would like to inform you how your personal data is collected and processed within our company. We assure you that your personal data is protected and managed in compliance with the legislation in force and, in particular, in accordance with the Data Protection Laws.

Who is this privacy notice for?

This privacy notice applies to employees whose personal data is being processed in relation to the employment process (e.g., HR, payroll, benefits, etc.).

Who is responsible for processing the data?

The data controller is IAVI INDIA, whose registered office is located at Unit no. 810, 8th Floor, Emaar Capital Tower – 1, Mehrauli Gurugram Road, Sikandarpur, Sector 26, Gurugram, Haryana – 122002 (India)

IAVI INDIA's Grievance Redressal Officer (GRO) can be contacted at gro@iavi.org.

What categories of data do we process about you and why do we process them?

IAVI INDIA collects and processes the following categories of personal data:

- **Contact details**, such as your name, email, telephone number, work address and private address;
- **Date of birth, gender and equal opportunities information** (e.g., ethnic origin, disability, etc.)
- **Family details**, such as your marital status, next of kin, dependents, emergency contacts;
- **Professional details**, such as your place of practice, job title, CVs, professional qualifications, terms and conditions of your employment, performance evaluations, disciplinary procedures;
- **Criminal Record Data**, such as actual or suspected crimes, to comply with our legal obligations to prevent fraud;
- Certain **financial information**, such as your bank account details.

We collect personal data about you directly from you. Note that if you do not provide your personal data, we will not be able to employ you.

Under what lawful basis do we process your data?

We primarily process your personal data in relation to your employment to meet our contractual obligations with you.

We also process your personal data in relation to your employment to satisfy our legal obligations, e.g., labor laws.

Who do we share your personal data with?

IAVI INDIA may share your personal data with others, in connection with the purposes described in this notice. In particular, we may make your personal data available to:

- IAVI INDIA affiliates outside the jurisdictions in which the data was initially collected;
- National authorities;
- Our trusted service providers that supply services to us, such as legal counsel, HR consultants, auditors and benefits providers;
- Other trusted parties pursuant to a court order, to protect the interests of IAVI INDIA, or where otherwise required by law or legal process;
- Actual or prospective purchasers of IAVI INDIA businesses in the event of a sale, merger or acquisition.

Sharing your personal data as described above may involve transferring it to other countries, including countries outside of the country you live in, such as the USA, whose data protection and privacy laws may not be equivalent to, or as protective as, those that exist in your country of residence. Any transfers of Personal Data to IAVI INDIA affiliates, vendors or suppliers will be done in compliance with the international data transfer restrictions that may apply under the Data Protection Laws, including, where appropriate, through the use of appropriate safeguards (e.g., standard contractual clauses for data transfers).

You can receive a copy of the appropriate safeguards by contacting IAVI INDIA's GRO at the contact details provided above (in the section entitled "Who is responsible for processing the data?").

What security measures does IAVI INDIA take to protect your personal data?

IAVI INDIA will take appropriate technical and organizational security measures to protect your personal data in compliance with applicable data protection and privacy laws, which includes protection against accidental or unlawful destruction, loss, alteration, unauthorized access to, or disclosure of your personal data.

When IAVI INDIA retains a service provider, that provider will be carefully selected and required to use appropriate measures in accordance with applicable law to protect the confidentiality and security of personal data. That provider will only be permitted to process your data on the written instruction of IAVI INDIA.

How long do we keep your data?

Your personal data will be stored for no longer than our obligations under applicable laws, considering the purpose(s) it was collected for.

What are your rights and how can you exercise them?

Under the Data Protection Laws, you have the following rights in relation to your personal data:

- Right of access;
- Right to rectification;
- Right to restriction of processing; and
- Right to erasure.

Please note that these rights are not absolute and will be subject to a case-by-case analysis by IAVI INDIA's GRO.

To exercise your rights, contact IAVI INDIA's GRO at the contact details provided above (in the section entitled "Who is responsible for processing the data?"). If IAVI INDIA is unable to provide the requested data or fulfil your request, you will be provided with the reason(s) for such decision.

Please contact us if any of the details you have provided change (e.g., name or address).

Changes to this Employee's Privacy Notice

*This Privacy Notice is effective from **January 26, 2022**. We reserve the right to change this notice at any time (for example, to comply with changes in laws or regulations; our practices, procedures and organizational structures; requirements imposed or recommended by supervisory authorities; or otherwise). Changes to this notice shall be applicable on the effective date of implementation. We will communicate any changes to you, where we are required to do so.*