

INDIA PRIVACY POLICY

03/09/2019



Our Commitment

Allegis Services (India) Private Limited and our related entities ("**Allegis**", "**we**" or "**us**") are committed to providing you with the highest levels of professional service. This includes protecting your privacy in accordance with the *Information Technology Act 2000* ("**Act**") and *The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information)* ("**Privacy Rules**"), as we understand the importance of privacy of your personal information.

This Privacy Policy sets out how we collect, hold, use and disclose your personal information. By visiting our website, requesting our services, applying for a job with us or otherwise providing us with your personal information, you consent to your personal information being collected, held, used and disclosed as set out in this Privacy Policy.

This Privacy Policy applies to all individuals (including our clients, the individuals whose personal information is collected from clients or other third parties, job applicants and prospective employees) who provide us with their personal information.

What personal information do we collect?

We collect personal information (including your health information) that is necessary for us to provide you with the services you request, manage your requests and improve our business. Such personal information usually includes your name, date of birth, address, email and telephone numbers. In addition, we may collect the following personal information:

- **For recruitment purposes:** your previous work history, performance appraisals, qualifications, information about incidents in the workplace, health information, personal history, opinions from referees, information in relation to absences from work due to leave, illness or other causes and our assessment of you as a prospective candidate for recruitment, including any psychometric or skills testing.
- **For payroll purposes:** your employment details, bank account details and other ancillary information that is required to fulfil contractual, legislative, filing and reporting obligations (including the payment of salary and wages)

How do we collect personal information?

Where possible, we collect your personal information directly from you, for example in person, over the telephone, by email, when you set up an account with us or complete one of our online or hard copy forms or attend a group session at one of our assessment centres. We may record or listen to telephone calls between you and our consultants in order to improve our services. When this occurs, you have the chance either to end the call, or to ask to be transferred to another line where monitoring or recording does not take place (if this is available).

In most situations, we will also obtain your personal information from third parties such as our clients, your referees, educational institutions and current and former employers.

We may also automatically collect certain information when you visit our website, some of which may personally identify you. Such information includes the type of browser you are using, the type of operating system you are using, your IP address and how you use our website. You may at any time control the settings on your browser to limit the information we may collect from you through cookies. Please note that by limiting the collection of certain information through cookies, you may not be able to enjoy certain functions on our website.

If you would like to access any of our services on an anonymous basis or withdraw your consent in relation to any personal information provided to us previously, please let us know in writing. If this is possible and lawful, we will take reasonable steps to comply with your request. However, if you choose not to provide us with your personal information we may not be able to provide you with the services or assistance you require, including arranging suitable interviews for you.

If you provide us with personal information about another individual, before doing so you:

- must tell that individual that you will be providing their personal information to us and that we will handle their personal information in accordance with this Privacy Policy;
- must provide that individual with a copy of (or refer them to) this Privacy Policy; and
- warrant that you have that individual's written consent to provide their personal information to us and to the handling, retention, use, disclosure and/or transfer of their personal information in accordance with this Privacy Policy.

Why do we collect personal information and how do we use it?

We collect your personal information and use it for the purpose for which it was provided to us, other related purposes or as permitted or required by law. Such purposes include:

- providing our clients and/or you with our services;
- facilitating placement operations and recruitment opportunities for job applicants, including assessing your application for employment with prospective employers and verifying your information;
- providing you with further information about the recruitment opportunities or services you requested;
- conducting surveys of job applicants in relation to the services we provide;
- providing you with information about Allegis and its activities that are of relevance to you (if you have consented to receive this); and
- any other purpose identified to you at the time of collecting your personal information.

When do we disclose your personal information?

Any personal information you provide to us may be disclosed, if appropriate, to third parties for the purpose of facilitating placement operations, verifying your details, providing payroll services, marketing our services and managing our business. Such third parties may include:

- any of our related entities, affiliates and agents;
- our clients, including your prospective employers and external organisations seeking labour;
- educational institutions and background screening providers to verify your qualifications;
- your referees and current and former employers;
- our third party service providers, contractors and suppliers (such as our IT service providers for hosting databases);
- our professional advisors including our accountants, auditors and lawyers; and
- any other third parties notified to you at the time of collecting your personal information.

It is also possible, though unlikely, that we might be forced to disclose personal information in response to legal process or when we believe in good faith that the law

requires it, for example, in response to a court order, subpoena or a law enforcement agency's request.

Do we send information overseas?

We may store your information in our data storage facilities overseas which may be located in Australia, the United States of America, the Philippines, Malaysia and New Zealand. Your information may be accessed by members of the Allegis Group in APAC, including in China, Malaysia, Singapore, Hong Kong, Japan, Australia, New Zealand and the Philippines. [We will take reasonable steps to ensure that the overseas recipient complies with the applicable laws and this Privacy Policy (for example by putting in place appropriate contractual arrangements with the recipient to safeguard your privacy).]

Accuracy, access to and correction of your personal information

We will take reasonable steps to ensure that the personal information that we hold is accurate, complete and up to date. Please contact us using the contact details below if your details have or are about to change, or if you wish to otherwise update or correct your personal information.

We will, on request, provide you with access to the personal information we hold about you unless otherwise required or permitted by law. ¹

If you would like to access your personal information, please make your request with the subject header "Personal Information Access Request" in writing addressed to our Privacy Officer using the contact details below and provide proof of your identity.

Security of your information

We will take reasonable steps to secure your personal information that we collect and hold. Electronic information is protected by various security measures and stored in a facility which implements international standards. Access to information and databases are restricted to authorised personnel that need access to the information in order to perform their duties.

All electronically captured job applicant and client data are passed through a secure site using encryption technology to ensure your personal information is protected if it is sent over the Internet. Please note that we cannot ensure that any information transferred

over the Internet is fully secure and we are not responsible for any unauthorised disclosure or transfer.

It is your responsibility to ensure you protect your personal information (for example, by protecting any usernames and passwords) and you should notify us as soon as possible if you become aware of a security breach.

Complaints

If you wish to make a complaint about a breach of this Privacy Policy or the privacy principles under the Act, you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint as well as any supporting evidence and/or information.

We will refer your complaint to our Privacy Officer who will investigate the issue within 30 days. Our Privacy Officer will determine the steps (if any) that we will undertake to resolve your complaint. Such steps may include discussing the options for resolving the complaint with you, notifying relevant employees the subject of a complaint and seeking their input or escalation.

We will contact you if we require any additional information from you and will notify you in writing of the outcome of our investigation.

Revisions to this Privacy Policy

We reserve the right to revise this Privacy Policy or any part of it from time to time. Please review this Privacy Policy periodically for changes. If we make material changes to this Privacy Policy, we will notify you by putting a notice on the "Home" page of our website www.allegisgroup.com and will seek your consent to any material changes if required to do so by the Privacy Rules.

Your continued use of our website, products, services or provision of further personal information to us constitutes your deemed acceptance of the revised Privacy Policy. Please note that for material changes, your continued use of our website, products, services or provision of further personal information to us once you have been notified of the revised Privacy Policy constitutes your deemed acceptance of the revised Privacy Policy.

How to contact us

If you would like more information about our privacy practices or have any questions in relation to this Privacy Policy, please contact our Privacy Officer using the contact details shown below:

Email: Apac.Privacy@allegisgroup.com