

Privacy Policy - Australia

Objective

We respect an individual's right to privacy and are committed to protecting the privacy of personal information supplied to us either by an individual or others. This Policy lays down our practices regarding collection and use of your personal data and sets forth your privacy rights. This Policy applies to information supplied to us on our website.

We may use personal information provided to us for any of the purposes as set out in this Policy, or as otherwise disclosed at the point of collection.

We respect your rights to privacy under the Privacy Act 1988 (Cth) (Act) and we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

This policy does not apply in respect of any acts or practices that are exempt from application of the Australian Privacy Principles (APPs) or acts or practices that are otherwise not required by the Act.

Definitions

"Personal Information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not. This may include your name, address, telephone number, email address and profession or occupation.

"Sensitive Information" means: (a) information or an opinion about an individual's: racial or ethnic origin; or political opinions; or membership of a political association; or religious beliefs or affiliations; or philosophical beliefs; or membership of a professional or trade association; or membership of a trade union; or sexual orientation or practices; or criminal record; that is also personal information; or (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information; or (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or (e) biometric templates.

“We,” “us,” and “our” (and other similar terms) refer to ITC Infotech India Limited, its subsidiaries, and its branches if any.

“You” and “your” (and other similar terms) refer to our clients, individuals associated with our clients, contacts, suppliers, job applicants, staff and visitors to our website.

Personal Information We Collect and Hold

We may collect the following types of personal information:

Job Applicants:

We may collect information in relation to your job application that may include:

- Name, address, telephone number, email address, date of birth and other contact details;
- Competences, skills, experience and education, e.g., your CV or resume, previous employments, educational details and qualifications, third party references;
- health such as disability status in order to make any necessary accommodations during our interview process;
- Languages spoken, Citizenship and Nationality;
- Preferences, e.g., preferred country of employment, areas of interest as well as your preferred ways to be contacted by ITC Infotech);
- Your online user identity, e.g., usernames and other such information used in connection with authenticating you to our online recruitment management system;
- Technical Information: When you access our services online, our web servers automatically create records of your visit;
- Information collected during interviews: As part of our interview process, we may maintain audio/ video records of the interview (in case of telephone interviews or video enabled interviews) as well as comments noted by our interviewers;
- Other information, such as information found from public sources as well as information collected as part of reference checks, depending on the position you are applying for, and where necessary for the recruitment activities;
- Additionally, once you have been shortlisted, we may collect additional information such as Government ID, expectation of compensation and remuneration details,

information relating to your family members (for benefits administration), passport, visa and work permit (in case of expatriate), background check reports including educational, employment and criminal checks etc. where permitted by local law. Also, in certain cases, we may collect your bank account details, details of the expense incurred and relevant bills to reimburse any expenses incurred by you during the interview processes.

Employees:

We may collect information in relation to your employment that may include:

- Identification Information including name, gender, age, date of birth, email address, home address, contact details, government-issued identification numbers, photographs, demographic information, citizenship, nationality, marital status, date of marriage, dependent names, relationship, age or date of birth, domicile, or residence data.
- Educational and Professional Details including highest education, certifications, previous employment history with all supporting documents and proofs.
- Employment, credit checks, criminal checks, drug test report and other requirements as part of background verification.
- Past or current compensation and benefits information including details of salary and benefits, bank account details, salary reviews, records relating to holiday and other leaves, working time records
- Information about your performance at work, including references obtained from your previous place of work, performance evaluations, as well as opinions expressed by your colleagues, individuals who you manage or have managed, supervisors, and clients.
- Travel and Expenses Information including passport, visa details, corporate card transactions, expense details, supporting bills, claims reimbursed, and locations visited, supporting proofs carrying your Personal Information.
- Learning and Development Information including training, certifications, attendance & assessment records of past or present engagements.
- Information collected as part of Surveillance and Monitoring such as video surveillance data, physical access logs, activity logs from systems and communication channels etc.

The sensitive personal data collected may include:

- Information relating to your Health: such as physical examination results, accident and injury reports, disability status, medical records, doctor's certificates.
- As part of diversity surveys or equal employment opportunities, we may also collect information related to racial, ethnic origin or religious beliefs.

Others (e.g., Vendors, Customers and Visitors etc.):

We may collect information that includes:

- Contact details, personal identification details, personal preferences;
- Digital footprints including physical and logical access logs, website related logs, website preferences;
- Information provided through social networking sites like Facebook, LinkedIn or Twitter;
- Any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with us as usually we need to use your personal information to provide specific services to you, or which relate to or involve you.

Collecting Personal Information

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in ways including:

- through your access and use of our website or through social media;
- through hard copy forms;
- through electronic copy forms;
- through our intranet systems;
- during conversations between you and our representatives; or when you complete an application or purchase order;

- from third party companies such as credit reporting agencies, law enforcement agencies and other government entities;
- exchange of business cards.

Cookies

We may also collect certain information through cookies that, like most web servers, we transmit via our cookie folder from the browser on the hard disk of your computer, to recognize your device during a session or in your future visits to our website, primarily to provide better user experience. Please read our Cookie Policy carefully for more details about the information we collect when you use this website.

Holding Personal Information

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorized access, modification or disclosure. We may hold your information in either electronic or hard copy form.

To prevent unauthorized disclosure or access of the personal information we have in place appropriate security practices and procedures comprising of managerial, technical, operational and physical security controls to protect your personal data from unauthorized or inappropriate access, alteration, disclosure, and destruction.

Purpose For Collecting, Holding, Using and Disclosing Personal Information

We collect, hold, use and disclose your personal information for the following purposes (as the context requires):

Employment Candidates, Employees, and Others:

- to manage the job application process and/or to maintain our relationship with you;
- to update our records and keep your contact details up to date;
- for our internal business processing, administrative, marketing and planning requirements;
- to ensure security;
- for social networking;
- for payroll, tax and claims processing;

- for other purposes that are permitted under any agreement with you or made apparent to you at the time of collection;
- to answer enquiries and provide information or advice about our products or services;
- for lead generation and event follow up and providing client hospitality;
- to provide products and services to you and to send communications requested by you;
- to answer enquiries and provide information or advice about existing and new products or services;
- to provide you with access to protected areas of our website; and
- to assess the performance of the website and to improve the operation of the website.

Other purposes which may be applicable to all the above categories of individuals:

- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, planning, product or service development, quality control and research purposes of ITC Infotech India Ltd, its related bodies corporate, contractors or service providers;
- to provide your updated personal information to our related bodies corporate, contractors or service providers;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

Disclosing Personal Information

We may disclose your personal information to:

- our employees, related body corporates, contractors or service providers for the purposes of operating our business, fulfilling requests by you or providing products and services to you;

- suppliers and third parties with whom we have commercial relationships, for business, marketing and related purposes; and
- other organizations for authorised purpose that we have agreed with you separately.

Direct marketing

Personal data could be used for direct marketing for legitimate interest only after obtaining explicit written consent from the Data Subject. When Personal Data is used, disclosed or transferred for direct marketing, the Data Subject should be able to “opt-out” from having his/her data used for such purposes at any stage.

We do not share or sell your Personal Information to third parties for the third party to use for their own marketing or other purposes.

Accessing And Correcting Personal Information

You may have certain rights relating to your personal data provided for, under applicable law. These are the right to:

- Request access to your personal data and the processing activities on the personal data
- Request that your personal data is rectified if it is inaccurate or incomplete

To exercise the rights outlined above in respect of your personal data, please refer to **‘Contact Us’** below. We will endeavor to respond to you within an appropriate time as required by the law.

Complaints

You can notify us of any complaint you may have about our handling of your personal information please refer to **‘Contact Us’** below. Following your initial contact, you will be asked to set out the details of your complaint in writing in an email.

We will endeavour to reply to you within reasonable time of receipt of the completed complaint and, where appropriate, will advise you of the general reasons for the outcome of the complaint. While we hope that we will be able to resolve any complaints you may have without needing to involve third parties, if you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

Overseas Disclosures

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including but not limited to the following:

- our related bodies corporate, located in Australia, UK, European Economic Area (EEA), Switzerland, South Africa, Hong Kong, Canada, UAE, Brazil, Singapore and the US, and India;
- our data hosting and other IT service providers, located in Australia, UK, European Economic Area (EEA), Switzerland, South Africa, Hong Kong, Canada, UAE, Brazil, Singapore and the US, and India; and
- other third parties located in Australia, UK, European Economic Area (EEA), Switzerland, South Africa, Hong Kong, Canada, UAE, Brazil, Singapore and the US, and India.

External Links

Our website may contain links to other websites including social media websites, event websites, etc. whose information practices may be different from ours. You should read such third party's websites privacy notices before interacting or providing any of your personal information. We do not control those websites or their privacy practices. We do not endorse or make any representations about third-party websites.

Contact Us

If you have any questions in relation to this Privacy Policy or our management of your personal information you can contact our Data Protection Office by writing to DPO@itcinfotech.com or at:

Data Protection Officer

Morris Cohen, Glen & Co.,

1198 Toorak Road, Camberwell,

Victoria 3124, Australia

Email: DPO@itcinfotech.com

Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated on 09th November 2022.