

LPL Global Business Services, LLP - INDIA JOB APPLICANT PRIVACY POLICY

This policy (“**Privacy Policy**”) applies to the personal data collected about job applicants during the recruitment process in India (for the purposes of this Privacy Policy, “**you**” or “**your**”). This Privacy Policy further describes how LPL Global Business Services, LLP, (“**Company**”, “**we**” or “**us**”) will, from time to time, collect, store, process and transfer certain personal data about you that you share with us when you express your interest in working with us, or during any recruitment process that you undergo with us, either directly or through a third party service provider. Unless otherwise specified, when used in this Privacy Policy, “**Company**” refers to all affiliates and subsidiaries of LPL Global Business Services, LLP.

1. Types of Information Collected

We process different types of your personal data, for example:

- Contact information and other details (such as full name, address, email address, phone number, and LinkedIn profile details);
- Professional or employment-related information, such as your job application or resume, employment and career history, references, certifications, visa or work permit details (to the extent applicable) information about skills and abilities, accomplishments and awards, training and development information, type of employment sought, or other job preferences, including how you heard about the position and any pre-employment assessment that may capture information about your personality and behaviour;
- Nationality; place of birth; date of birth; and national identification number(s) or government-issued identity card, including Aadhaar number (to the extent permitted under applicable laws and in accordance with applicable laws);
- Demographic information (such as age, marital status, and gender);
- Education and work history (such as resume, qualifications, language abilities, work experience, job titles and responsibilities, previous salary details and language proficiency, education records, such as grades and transcripts); and
- Job interview details, including interview notes and evaluations, responses to screening and assessment questions, assessment results, and any other information provided in connection with the recruitment process.

We only collect personal data you voluntarily provide to us when you apply to the Company for a position, express your interest in joining us, or when you contact us or information that you provide when we contact you ourselves or through a third-party service provider. We may also collect any personal data about you from third parties such as external recruiters, background check and screening providers, previous employers and educational institutions.

2. Purpose and use for which personal information is collected

Subject to applicable laws, your personal data, which may include sensitive data that you provide to us, will be processed only for lawful purposes, including but not limited to:

- Evaluation of your skills, qualifications and interests provided in your application for a position with us, and communicate with you about the status of your application or notify you regarding any future openings or opportunities;
- Conducting interviews and assessments if we shortlist you to participate in our recruitment process;
- Performing pre-employment screening and background checks if we proceed with your application or offer you a job;
- Analysing, developing and improving our recruitment process and activities based on your feedback;
- Processing your personal data where required by applicable law, including responding to government, law enforcement, public authority and judicial requests for information (including, without limitation, to meet a country's national security or law enforcement requirements), responding to discovery requests/for disclosure in litigation, or where otherwise required by applicable laws, court orders, government regulations, or regulatory authorities, whether within or outside the country in which you may be located; and
- To safeguard, uphold, and enforce the legal rights, interests, and responsibilities of the Company, including conducting investigations and assessments, and addressing any legal claims involving you in any proceedings.

3. **Sharing Your Data with Third Parties**

Subject to applicable laws, where necessary to undertake the recruitment process, or for the purposes described in this Privacy Policy, your personal data, including sensitive personal information, may be shared with (1) providers who perform services on behalf of us, including but not related to services pertaining to and ancillary to recruitment, (2) any service providers who are not part of the Company, and/or (3) other third parties. Subject to applicable laws, data may be stored on several databases, including third-party cloud storage providers, including those outside India.

Examples of service providers and third parties with whom your data may be shared include:

- External recruiters, pre-employment screening services, background check providers and providers of applicant tracking systems and other service providers engaged by us in relation to the recruitment process;
- Job application management providers, IT service providers, security service providers, and other relevant service providers in the company ecosystem;
- Lawyers, consultants, and other professional advisors; and
- Government entities and regulators, courts, and law enforcement agencies (whether within or outside your country), including where legally required for national security and other law enforcement requests.

Wherever required under applicable law, we will enter into data processing or similar agreements with third-party service providers.

4. **Transfers of Data Outside of Your Country**

Subject to applicable laws, your personal data may be transferred to other entities related to the Company or to third parties to the extent necessary for us to perform our obligations, or for you to participate in the recruitment process, or for the reasons set forth in this Privacy Policy.

Similarly, subject to applicable laws, your data may be disclosed and transferred to a person or company that is not part of the Company and located in any country for any of the reasons set out in this Privacy Policy. Where relevant, transfers may be made to respond to law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities. Such transfers may include lawful access by courts or governmental authorities outside your country, after having ensured that only your minimal necessary data is disclosed and transferred, or that such data is de-identified or that, where possible, appropriate stipulative court orders have been issued.

5. **Security Practices and Procedures**

We are committed to taking appropriate steps to ensure that your personal information is properly secured against unauthorized or accidental destruction, alteration, or disclosure, accidental loss, unauthorized access, misuse, unlawful processing, damage, or similar risks using technical, physical, and organisational measures prescribed under applicable law. Furthermore, we contractually ensure that any third party processing your personal information on our behalf maintains at least equal security standards.

6. **Retention**

Personal data or sensitive data pertaining to you will not be retained by us beyond the period necessary in light of the reasons for which it was collected, and at all times subject to applicable laws.

7. **Updating Data**

Subject to applicable laws, you have the responsibility to ensure that changes in your personal circumstances are notified to us to ensure that all your data is kept up to date. You may also have the right under applicable law to access and correct personal data concerning you, subject to limited exceptions that may be prescribed by applicable law. Where justified and allowed by applicable law, you may also require that data be deleted, blocked, or oppose further processing of your data.

Your right of access, correction, deletion, nomination, cancellation, and opposition, and your responsibility to notify changes in your personal circumstances, are exercised by signed request or by contacting Mona.Nadim@lplfinancial.com.

8. **Grievance Officer**

For any grievances, complaints, or clarifications in relation to the processing of your personal information or in relation to this Privacy Policy, please contact:

Name : Mona Nadim
Designation : Chief Privacy Officer
Email ID : Mona.Nadim@lplfinancial.com
Mobile number:+17044264769

You also have the right to lodge any complaints you may have regarding our processing of your personal information to a supervisory authority under applicable law.

We reserve the right, at our discretion, to change, modify, amend, add, or remove portions of this Privacy Policy at any time. We recommend that you review this Privacy Policy periodically to ensure that you are aware of our current privacy practices. You hereby agree and acknowledge that we will not be responsible for your failure to remain informed about such changes.

By sharing your personal information with us, you agree that you have read and understood all the terms set out in this Privacy Policy.