

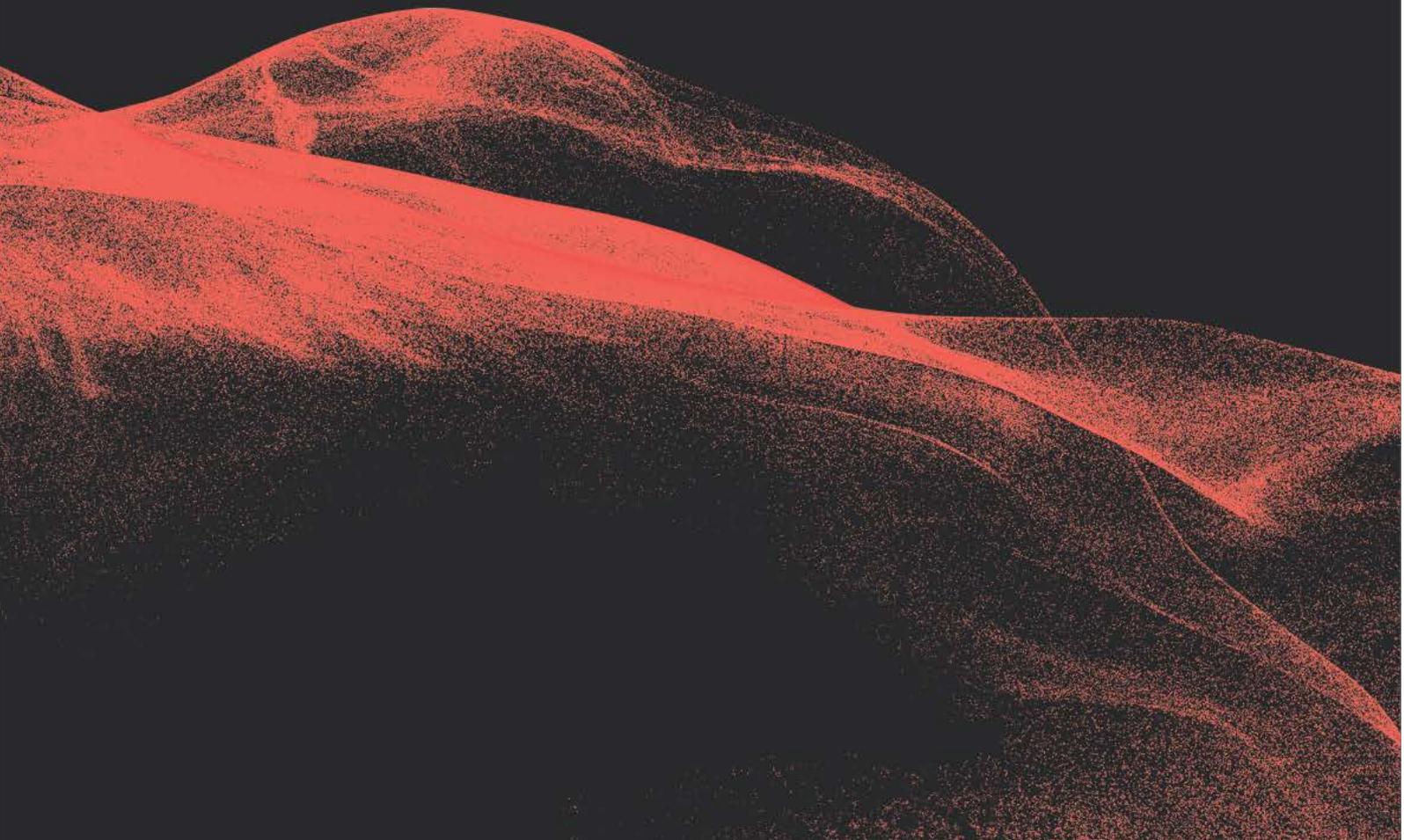


A Larsen & Toubro  
Group Company

LTM

# Global Data Privacy Notice for Subcontractors

Version 4.0 | 18 April 2025



## Copyright Information

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This document is the exclusive property of LTIMindtree Limited (LTIMindtree); the recipient they may not copy, transmit, use or disclose the confidential and proprietary information in this document by any means without the expressed and written consent of LTIMindtree.

## References

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For more details, please refer to the following documents:

No	Document Name	Ver	Location
1.	LTIMindtree General Data Privacy Statement	2.0	<a href="https://www.ltimindtree.com/general-privacy-policy/">https://www.ltimindtree.com/general-privacy-policy/</a>
2.	LTIMindtree Global Data Privacy Statement	2.0	<a href="https://www.ltimindtree.com/privacy_policy/">https://www.ltimindtree.com/privacy_policy/</a>
3.	LTIMindtree Cookie Policy	2.0	<a href="https://www.ltimindtree.com/cookie-policy/">https://www.ltimindtree.com/cookie-policy/</a>



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# Introduction

For the purposes of your engagement with LTIMindtree Limited, a company incorporated in India having its registered address at Gate No. 5, L&T Technology Center, Saki Vihar Road, Powai, Mumbai – 400072, India which has several branches and subsidiaries around the world (“LTIMindtree” or the “Company” or “we” or “us” or “our”), we collect, hold, process and transfer Personal Data (as defined below) about you as it is necessary for the administration, management and performance of your engagement or is otherwise in the legitimate interest of the Company in our capacity as a data controller.

Protecting the privacy rights of data subjects and safeguarding their Personal Data is now being treated as a basic right of an individual and a legal requirement in many parts of world. LTIMindtree, being a global organization, respects the privacy of data subjects and is committed to complying with the applicable data privacy laws and legislations (including but not limited to EU General Data Protection Regulation 2016/679 (the “GDPR”), the GDPR as saved into UK law (the “UK GDPR”) (references in this Notice to GDPR also include UK GDPR) California Consumer Privacy Act, California Privacy Rights Act (together, the CCPA Regulations), The Privacy Act 1988 (Australia) including the Australian Privacy Principles (APP), Data Protection Act 2018 (UK), Information Technology Act 2000 read along with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and Personal Data Protection Act 2012 (Singapore), the Federal Law on Protection of Personal data held by Private Parties and its Regulations (Mexico) (the “LFPDPPP, in its Spanish acronym), the Swiss Federal Act on Data Protection 1992 and as of September 1, 2023, the Swiss Federal Act on Data Protection 2020, the Federal Decree-Law No. 45/2021 on the Protection of Personal Data (UAE), the Protection of Personal Information Act 4 of 2013 (South Africa), the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA) and any substantially similar provincial law, Personal Data (Privacy) Ordinance Cap. 486 (Hong Kong), the Personal Information Protection Law (“PIPL”) (China), the Privacy Act 1988 (Cth) (Australia) and other applicable privacy laws to the extent that they apply to LTIMindtree’s data processing and business operations) (the “Data Privacy Laws”).

We treat your Personal Data in accordance with the Data Privacy Laws and the purpose of this notice is to make you aware of:

- Which Personal Data we Collect?
- How we collect and Use Your Personal Data?
- Purpose and lawful basis of Processing
- How we Share and Disclose Personal Data?
- What Rights do you have?
- How do we keep Personal Data secure?
- How to get in touch with us regarding Data Privacy?

## Scope

**Applicability:** This Notice applies to all subcontractors engaged at the time of onboarding. This Notice does not form a part of any contract to provide services. It covers Personal Data and Personal Information disclosed by you and/or your employer which is Processed by LTIMindtree during the course of your interaction with us.

**Role:** LTIMindtree acts as a Data Controller (as defined below) with respect to any Personal Data or Sensitive Personal Data it holds about you. LTIMindtree is responsible for ensuring that it uses your Personal Data in compliance with the Data Privacy Laws. The relevant entities that may act as the Data Controller are listed in “With whom we may share your Personal Data” section of this Notice.

This Notice sets out the basis on which any Personal Data, Personal Information and Sensitive Personal Data about you that you and/or your employer provide to us, that we create, or that we obtain about you from other sources, will be processed by us.

## Definitions

The meaning of some of the terms in use in the Notice are explained below:

Term	Description
Personal Data	<p>Means any information relating to an identified or identifiable natural person (“Data Subject”); Any information which constitutes “personal data” or “personal information” of Data Subject under the applicable Data Privacy Laws, including information which can reasonably associate or link to an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier including but not limited to a name, an identification number, location data, Taxpayer Registration number (“CPF/MF”), Identity Card (“RG”), an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This includes the defined term of personal information as defined in Canadian data protection laws. Personal Data includes ‘personal information’ as defined in the Privacy Act 1988 (Cth) (Australia).</p> <p>With respect to Chinese residents, Personal Data does not include information that has been anonymized. LTIMindtree does not collect Personal Data from Chinese residents that are under the age of 14</p>

<p>Personal Information (applicable only to California residents) (under US laws)</p>	<p>Information pertaining to residents of California that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, but does not include information that is lawfully made available from federal, state or local government records, nor does it include “deidentified” or “aggregate customer information” as those terms are defined pursuant to the CCPA Regulations. LTIMindtree does not collect Personal Information from California residents that are under the age of 16.</p>				
<p>Sensitive Personal Data (including specific categories of personal data under GDPR)</p>	<p>Pursuant to Article 9(1) GDPR, specific categories of personal data refer to the processing of personal data revealing racial or ethnic origin, or political opinions, or religious or philosophical beliefs, or trade union membership, or the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, or data concerning health or data concerning a natural person's sex life or sexual orientation. Sensitive Personal Data includes ‘sensitive information’ as defined in the Privacy Act 1988 (Cth) (Australia). With respect to California residents, in addition to the preceding, the term also includes government identification numbers, financial numbers or financial account access credentials, precise geolocation, and the contents of communications to which LTIMindtree is not an intended recipient national origin or ancestry, sexual orientation, sex (including, gender, gender identity, and gender expression), pregnancy, childbirth and medical conditions related to same, age, physical or mental disability, veteran status, genetic information, vaccination information and citizenship</p>				
	<p>For Mexico only: In addition to the preceding, any other categories of personal data that touch the most private areas of the data subject's life, or whose misuse might lead to discrimination</p>	<p>For Switzerland only: The definition of “a natural person's sex life or sexual orientation” also includes the intimate sphere (instead of the sexual life/orientation), social security measures, administrative or criminal proceedings and administrative</p>	<p>For Chinese residents only: In addition to the preceding, the term also includes other Personal Data of which the leakage or illegal use could easily lead to the violation of the</p>	<p>With respect to California residents, in addition to the preceding, the term also includes government identification numbers, financial numbers or financial account access credentials, precise geolocation, and the contents of</p>	<p>In Denmark only: Information on social security numbers and criminal offences are not considered as sensitive personal under the GDPR but constitute its own category of</p>

	<p>on or involve a serious risk for the data subject are also considered as sensitive data.</p>	<p>e or criminal sanctions.</p>	<p>personal dignity of a natural person or harm to personal or property safety, such as information on biometric identification, financial accounts, whereabouts and personal information of minors under the age of 14.</p>	<p>communications to which LTIMindtree is not an intended recipient. .</p>	<p>information. Processing of this requires specific legal basis under the Danish data protection act.</p>
<p>Process, Processes, Processed or Processing</p>	<p>Means any operation or set of operations which is performed on Personal Data or Personal Information or on sets of Personal Data or Personal Information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, treatment, erasure or destruction.</p>				
<p>Data Subject</p>	<p>Means a particular natural person (i.e. an identified or identifiable natural person to whom Personal Data relates. In case of a minor/ individual with mental disabilities, the data subject would be represented by a legal representative or the holder of parental responsibility (parent/ guardian). For the purpose of clarity of this Statement, “Data Subject” means LTIMindtree current and previous employees, prospective candidates, current, prospective and previous customer personnel, current and previous partner/vendor personnel, website visitors, sub-contractors and visitors. LTIMindtree does not generally process Personal Data/ Personal Information from Data Subjects that are under the age of 18 except in specific cases (See. “Personal Data of Individuals below 18 years” section). For the purpose of CCPA, Data Subject shall include California residents.</p>				

	With respect to Chinese residents, LTIMindtree does not collect Personal Data from Chinese residents that are under the age of 14.
Data Controller	Means the natural or legal person, organization, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by national or applicable laws, the controller or the specific criteria for its nomination may be provided for by national or applicable laws.
Data Processor	Means a natural or legal person, organization, public authority, agency or other body which processes personal data on behalf of the Data Controller
Artificial Intelligence (AI)	Means a machine-based system that is designed to operate with varying levels of autonomy including assistance, and that can, for explicit or implicit objectives, generate outputs such as predictions, recommendations, or decisions that influence physical or virtual environments. AI technologies include any artificial intelligence or machine learning foundation platform, model, application or technology (including any generative artificial intelligence technology).

Please refer to the Global Data Privacy Statement found [here](#) on [www.LTIMindtree.com](http://www.LTIMindtree.com) for terms that have not been defined above. Please also refer to the relevant jurisdiction specific Data Privacy Laws for all other terms.

## What Personal Data is Collected

Your Personal Data are collected and processed by LTIMindtree for your engagement, administration and management purposes which are as follows:

- Identification Information including name, date of birth, email address, home address, contact details, government-issued identification numbers, photographs for LTIMindtree identity card and intranet portal profile.
- Background check reports including educational, employment in accordance with applicable law. It is being agreed that no criminal background check will be conducted without your express prior consent or legal authorization when consent is not a valid legal basis for processing.
- Information about your performance at work, including performance evaluations, as well as performance related feedback by your colleagues, supervisors, and clients of LTIMindtree, references obtained from your previous place of work.

- Learning and development information including but not limited to trainings, attendance and assessment records.
- Information collected as part of surveillance and monitoring such as video surveillance data, physical access logs, activity logs from systems and official communication channels (if applicable).
- LTIMindtree may by itself or through entities authorised on its behalf collect your images, photographs and/or video recordings (“Image”) taken during your employment, association with us. This Image may be used by LTIMindtree as part of its customer testimonial, internal and external promotion of its or its group of companies, employer branding, marketing or to facilitate in building a positive image of LTIMindtree.
- In order to validate your identity, LTIMindtree may collect a picture of your government identification card such as a driver’s license and any other government issued identification document that has a photo of you with your name and related credentials, that will prove your identification

## How we collect your Personal Data/ Personal Information / Sensitive Personal Data

LTIMindtree collects personal data about subcontractors through application, forms that are required to be filled at the time of subcontractor on-boarding either directly by you and/or from the service provider or sometimes indirectly from third party service including background check provider/agency, credit reference agencies, etc. We may collect additional personal data in the course of the period you would be working for us. All data including any additional data collected during the on-boarding process will be used and stored for performance of hiring activity and the service agreement, as well as for complying with our legal obligations or legitimate interests.

This information would be collected by us in a number of ways through multiple channels while engaging with our organization through your employer and over time during your engagement with us:

- Directly from you (When you contact any LTIMindtree’s representative via the intranet platform or by telephone, email or in person)
- From third parties and other sources (through your employer), which may also include public sources such as professional networking platforms.

# Purpose and legal basis of Processing

We, at LTIMindtree, must keep and process information about you for the purpose of your engagement with LTIMindtree through your employer. The information we hold, and process will be used for our management and administrative uses only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, whilst you are working for us, at the time when your engagement ends and to a limited extent after you have left. This includes using your Personal Data to enable us to comply with your employment contract, to comply with any legal requirements, pursue our legitimate interests and protect or defend our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations or fulfil our contractual obligations with your employer and we will inform you about the implications of such decision. Some of the key processing activities shall include:

- Staff administration – We keep engagement records in line with industry practice. It is in our legitimate business interests to process these records. Under this obligation LTIMindtree hereby ensures data minimization and shall not keep your Personal Data for longer than statutorily required.
- Project Specific Feedback – We process Personal Data as part of project specific feedback. It is in our legitimate business interest to process these records.
- Discipline, grievance, dismissal and for the establishment, exercise or defense of legal claims – From time to time, we may need to process Personal Data in connection with disciplinary, grievance and dismissal processes. It is our legitimate business interest to process these records to investigate facts, claims and grievances for internal purposes and to establish, exercise or defend LTIMindtree in legal or administrative procedures.
- Monitoring and Surveillance - We monitor LTIMindtree provided computer, landlines/mobile telephone use and also, subject to prior notifications, carry out CCTV monitoring of key areas, as detailed in our Information Security Policy. We also keep records of your hours of work by way of our access control system, as detailed in the Company intranet. It is our legitimate business interest to keep such records, for the safety and security of the Company and its staff.
- Health and safety - From time to time, we may need to process your Personal Data to comply with our legal business obligations in relation to health and safety at the workplace.
- To prevent fraud and report potential crimes – We process your Personal Data where we have a legal obligation to prevent fraud or to report potential crimes.

Where there is no legal obligation, it is in our legitimate business interest to detect fraud and, where appropriate, report potential crimes

- Audit Compliance – We may process Personal Data as part of our audit processes and engage third party auditors, from time to time. We have ensured that only Personal Data necessary is processed during such audits in order to comply with applicable laws and to satisfy our legitimate business interests.

You will, of course, inevitably be referred to in many Company documents and records that are produced by you and your colleagues and may be shared with clients in the course of carrying out your duties and the business of the Company. You should refer to the Data Privacy Statement, which is available on the intranet portal.

Using the legal basis of Legitimate interest of LTIMindtree or consent (when legitimate interest is not a legal basis for processing under local laws). We may process your Personal Data (or where relevant, your sensitive personal data) on other public interest grounds where we are subject to regulatory requirements and to the extent such processing is necessary by us for the performance of a task mandated by governmental authorities, regulatory authorities or any other law enforcing authorities in the public interest. We shall notify you prior to processing such data. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so without undue delay.

## Processing Sensitive Personal Data

We only process Sensitive Personal Data where legally permissible. If so, the collection and further processing of Sensitive Personal Data the following can only be lawful if:

- The Data Subject has given explicit Consent or Explicit Written Consent (where applicable) to the processing of his/her Sensitive Personal Data for a specified purpose, or where the Data Subject is physically or legally incapable of giving consent, but the processing is necessary to protect a vital interest of the Data Subject for example, where emergency medical care is needed.
- Without explicit consent when such Processing of Sensitive Personal Data is specifically authorised or mandated by applicable local Data Privacy Laws.
- When the processing of Sensitive Personal Data is necessary for the establishment, exercise or defence of the legal claims.

In addition, we may only process Sensitive Personal Data about subcontractors within the limits of the applicable laws of each country, for the following reasons:

- Where such processing is necessary for the purposes of carrying out the obligations and exercising specific rights of LTIMindtree or of the subcontractor engagement and social security and social protection law, for subcontractor engagement purposes, , as authorised by law or a collective agreement providing appropriate safeguards for the protection of fundamental rights and interests of the subcontractor.

Additional requirements from countries specific privacy laws:

- LTIMindtree shall process sensitive personal data where the below mentioned lawful grounds of processing for special categories of data is applicable:
  - Processing is necessary for compliance with any applicable regulatory, auditing, accounting, anti-money laundering or counter terrorist financing obligations or for the prevention or detection of any crime.
- For France: LTIMindtree does not process genetic, biometric data and data concerning health.
- LTIMindtree should process special categories of personal data if processing is authorized by (CNDP) Morocco<sup>1</sup>.
- In case the LTIMindtree intends to process special categories of personal data (data related to Marital relationship, criminal offenses etc.), LTIMindtree shall ensure that it obtains prior permission from Ministry of Transport and Communications (MoTC). MoTC may include other types of personal data in the definition of special categories of data if misuse or disclosure of such data may cause serious harm to an individual<sup>2</sup>.
- For Singapore: LTIMindtree shall ensure that National Registration Identification Number (NRIC) and other identification number like Birth Certificate numbers, Foreign Identification Numbers (“FIN”) Work Permit numbers are not collected, used or disclosed in Singapore except:
  - where required under Singapore law or an exception under the Personal Data Protection Act 2012 applies; or
  - where such collection, use and disclosure is necessary to accurately establish or verify the identities of Data Subjects to a high degree of fidelity.<sup>3</sup>.
- LTIMindtree shall only use the name of the subcontractor and only the last four digits of his or her social security number or a subcontractor identification number other than a social security number, on the salary payslip<sup>4</sup>.
- If LTIMindtree processes Sensitive Personal Data for reasons not contemplated by Section 7027(m) of the California Consumer Privacy Act Regulations, it will provide a notice of the right to limit the use of Sensitive Personal Data pursuant to those regulations.
- In the UK, LTIMindtree processes special category personal data for purposes connected to subcontractor engagement<sup>5</sup>.
- The processing of the Sensitive Personal Data must be limited to the minimum necessary. Databases containing Sensitive Data may not be created without justification, but only for legitimate, specific, and consistent purposes. The consent obtained for the processing of Sensitive Personal Data must be freely given

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<sup>1</sup> Morocco - Law No 09-08, dated February 18, 2009

<sup>2</sup> Qatar - Law No. (13) of 2016 Concerning Personal Data Protection

<sup>3</sup> Singapore - Personal Data Protection Act (PDPA)

<sup>4</sup> USA - California Consumer Protection Act (CCPA)

specific, informed; unambiguous and in writing (by handwritten or electronic signature, or any other means of authentication).

- For China: LTIMindtree shall implement encryption measures for storage and transmission of Sensitive Personal Data with regard to Chinese residents.
- For Belgium: Under Belgian law<sup>6</sup>, the following measures must thus be taken in case genetic, biometric or health data are processed by LTIMindtree:
  - A list must be drawn up of all categories of persons (e.g., the manager of a department, IT personnel, all members of a specific team) that will be able to access the data, together with their status in relation to the envisaged processing activity.
  - A nominative list of all those persons must be drawn up and disclosed to the Belgian Data Protection Authority upon the latter's first request.
  - It should be ensured that those persons are under an obligation of confidentiality with respect to the personal data concerned.
- For South Africa: In terms of the South African Protection of Personal Information Act 4 of 2013, LTIMindtree will not Process Sensitive Personal Data unless the:
  - Processing is carried out with the consent of a Data Subject;
  - Processing is necessary for the establishment, exercise or defence of a right or obligation in law;
  - Processing is necessary to comply with an obligation of international public law;
  - Processing is for historical, statistical or research purposes to the extent that—
    - the purpose serves a public interest and the Processing is necessary for the purpose concerned; or it appears to be impossible or would involve a disproportionate effort to ask for consent and sufficient guarantees are provided for to ensure that the processing does not adversely affect the individual privacy of the data subject to a disproportionate extent;
  - information has deliberately been made public by the Data Subject; or
  - provisions related to the specific sets of Sensitive Personal Data as prescribed by sections 28 to 33 of the Act are, as the case may be, complied with.
- For Luxembourg: LTIMindtree is prohibited from Processing genetic data for the purpose of exercising its own specific rights in relation to employment law<sup>7</sup>.
  - LTIMindtree is prohibited from Processing subcontractor' medical data (including vaccination details) except in order to comply with a legal obligation<sup>8</sup>.
  - LTIMindtree is not permitted to conduct a criminal history search. LTIMindtree can only ask subcontractors to provide a criminal record, if certain conditions are fulfilled. LTIMindtree can only collect criminal record (Bulletin n°3 which includes convictions for certain offences and crimes) from the candidate himself/herself if LTIMindtree makes a written request

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<sup>6</sup> Belgium – Belgian Data Protection Act

<sup>7</sup> Luxembourg – Luxembourg Data Protection Act 2018

<sup>8</sup> Luxembourg – Labour Code and Data Protection Authority Guidelines

which must be included in the job offer and if such request is justified with respect to the job's description<sup>9</sup>.

- For Denmark: LTIMindtree shall only process personal data related to criminal convictions under the explicit consent of the data subject, or where it is necessary for the purposes of a legitimate interest clearly overriding the interests of the data subject.<sup>10</sup>
- LTIMindtree shall only process personal data related to social security numbers when 1) it stems from the law, or 2) the data subject has given consent under Article 7 GDPR, or 3) where the conditions for processing personal data laid down in Article 9 (2) (a), (c), (d), (e) or (d) of the GDPR are met.<sup>11</sup>
- Processing of personal data in a subcontractor engagement context covered by Articles 6(1) and 9(1) of the GDPR may take place if the processing is necessary for compliance with the controller's or the data subject's subcontractor obligations or rights laid down in other legislation or collective agreements.<sup>12</sup>

We may process Sensitive Personal Data about its subcontractors for the following reasons:

- Information relating to your health such as disability status (where required or permitted by local law), in order to make any necessary accommodations during our interview process;
- Where required for your role, and where permitted or required by applicable laws, Personal Data such as OFCCP data, diversity data shall be collected
- Occasionally criminal record (where required or permitted by local law), for criminal background check upon request from our customers. LTIMindtree shall process such information only based on your prior explicit consent or legal authorization when consent is not a valid legal basis for processing;
- For subcontractor engagement-related purposes, if it is necessary to exercise rights or comply with legal obligations derived from labour law, social security and social protection law, and there is no reason to believe that the subcontractor has an overriding legitimate interest in not processing the data.

When processing Sensitive Personal Data, we will take appropriate and specific measures to safeguard the interests of preserving adequate data security over Sensitive Personal Data, taking into account the applicable industry standards, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing.

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<sup>9</sup> Luxembourg – Law of 29 March 2013 on criminal records

<sup>10</sup> Denmark – Danish Data Protection Act

<sup>11</sup> Denmark – Danish Data Protection Act

<sup>12</sup> Denmark – Danish Data Protection Act

## Personal Data of Individuals below 18 years

We process Personal Data or Sensitive Personal Data of any individuals below the age of 18 years only for travel, immigration purposes or when you are visiting our premises. If we are required to process Personal Data or Sensitive Personal Data of such individuals, then We shall do so by taking explicit consent from their legal guardians and from the minor if they have capacity to give consent, based on their age and maturity. If it comes to your knowledge that We have unintentionally collected or received Personal Data or Sensitive Personal Data about an individual below the age of 18 years directly from them, then please immediately notify Us in the contact details provided in this Notice ("Contact Details, Complaints and Grievances" section below) and We will accordingly delete such information.

Note: We do not collect, use nor process Personal data of Individuals below 18 years on our website. If you are below the age of 18 years, then We do not want you to provide any of your Personal Data in our website.

## With whom we may share your Personal Data (the recipients/categories of the Personal Data)

We may disclose some Personal Data/ Personal Information to affiliates within our corporate group under the following circumstances:

- Personnel administration, subcontractor work and business management purposes.
- To provide service that is legally bound by a valid contract.
- To carry out day-to-day business transactions.
- To identify and contact the Data Subject.
- To ensure compliance to local laws and regulations.
- For Security Management purposes.

- Events and Initiatives
- We may also share Personal Data/ Personal Information outside of the corporate group where we rely on Third Parties to assist in its processing activities and we have satisfied legal requirements for such disclosure of the Personal Data. This includes:
  - Third Party agents/suppliers or contractors, bound by obligations of confidentiality, in connection with the processing of Personal Data/ Personal Information for the purposes described in this Notice. This includes IT and communication services providers.
  - Third Parties relevant to the products and services that we provide. This includes hardware or software manufacturers, other professional services providers, regulators, authorities and other governmental institutions.
  - To the extent required by law, regulatory bodies, enforcement bodies or court order, we may disclose Personal Data/ Personal Information/ Sensitive Personal Data in order to comply with any legal/regulatory obligation. In such instances we might not notify you of such requests, unless permitted by the law.
  - Where required for the performance of the role / task of subcontractors of LTIMindtree role, and where permitted or required by applicable laws, business contact details and Personal Data / Personal Information of subcontractors of LTIMindree (Eg: OFCCP data, personal contact details) may be shared with our clients and suppliers.
  - Subcontractors may reach out to the contact details provided in "Contact Details, Complaints and Grievances" section of this Notice to know the name of the third parties to whom we have shared their Personal Data.
  - With respect to disclosing Personal Data/ Personal Information to Third Parties, written contracts and data sharing agreements with Third Parties will include restrictions prohibiting the Third Party from retaining, using or disclosing Personal Data/ Personal Information for any purpose except performing the services specified in the contract or as otherwise permitted by applicable Data Privacy Laws.
  - Where it discloses Personal Data/ Personal Information to Third Parties, LTIMindtree will seek to use Data Processors or Sub processors that are capable of providing sufficient guarantees to implement appropriate technical and organizational measures in accordance with applicable Data Privacy Laws and shall put in place contractual mechanisms to ensure that the relevant Data Processor or Sub processor takes reasonable steps to ensure compliance with those measures.
  - We have offices and operations in a number of international locations and we share information between our group companies for business and administrative purposes through data processing agreements including the

standard contractual clauses signed within the entity. Please click [here](#) to view the list of entities and branches of Larsen and Toubro.

- Where required or permitted by law, information may be provided to others, such as regulators and law enforcement agencies.
- Where required for your role, and where permitted or required by applicable laws, your business contact details and Personal Data (Eg: OFCCP data, diversity data, personal contact details) may be shared with our clients and suppliers.
- We may also share your resume and background verification status to customers, upon request, to comply with our contractual obligations with these customers (when permitted or required by the applicable law).
- From time to time, we may consider corporate transactions such as a merger, acquisition, reorganization, asset sale, or similar. In these instances, we may transfer or allow access to information to enable the assessment and undertaking of that transaction. If we buy or sell any business or assets, Personal Data may be transferred to a third parties involved in the transaction.
- To comply with our statutory and other obligations and for the proper management of the LTIMindtree Group, LTIMindtree and our service providers, we may also provide information to other third parties, including, but not limited to, auditors, accountants, lawyers and other professional advisers, as well as to administrative authorities, courts, law enforcement and/or regulatory authorities, arbitrators, experts, adverse parties and/or their advisors. LTIMindtree hereby ensures that in case of sub processing of your Personal Data the obligations that LTIMindtree bears will be contractually reflected in our agreements with our partners, vendors and any other third party.
- LTIMindtree does not sell any Personal Data under any circumstances.

## Retention and Disposal of Personal Data or Personal Information

How long we continue to hold your Personal Data/ Personal Information will vary depending principally on:

- Purposes identified in this Notice for using the Personal Data/ Personal Information– We will need to keep the information for as long as is necessary for the relevant purpose; and
- Legal obligations – laws or regulation set a minimum period for which We will have to keep your Personal Data/ Personal Information;

- Disposal of Personal Data/ Personal Information shall be handled with utmost care and shall be governed in accordance with reasonable data security practices as detailed by its internal policies governing data disposal;
- Personal Data/ Personal Information shall only be Processed for the period necessary for the purposes for which it was originally collected as per applicable law and as stated in the LTIMindtree Retention Policy.

## Cross Border Transfer

We are part of Larsen and Toubro Group ([www.larsentoubro.com](http://www.larsentoubro.com)) companies which is an international group of companies and, as such, We transfer Personal Data / Personal Information personal data concerning you to countries where LTIMindtree has operations, and in particular to India. We may transfer Personal Data between our group affiliates companies and data centers for the purposes described above. These data transfers are necessary to provide our products and services. We may also transfer Personal Data on a need-to-know basis to our authorized third-party suppliers, or LTIMindtree customers and authorized business partners.

Where we transfer your Personal Data/ Personal Information/ Sensitive Personal Information outside of your jurisdiction, we will ensure that it is protected and transferred in a manner consistent with applicable Data Privacy Laws.

For transfers to our group companies, third parties, suppliers outside of the EEA, we use standard contractual clauses or an appropriate tool of transfer. You may reach out to us at [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com) if you would like more details about the tool/method used.

For transfers outside other jurisdictions, We ensure that there are relevant data processing agreements in line with the applicable Privacy laws signed between its Data exporting branch and its Data importing branch with appropriate responsibilities articulated.

For details regarding the transfer of data between jurisdictions, please refer to the Global Data Privacy Notice which can be accessed [here](#).

# Security of Personal Data/ Personal Information/ Sensitive Personal Data

In order to comply with our data security obligations under applicable Data Privacy Laws, We have adopted the following physical, technical and organizational security measures to ensure the security of your Personal Data/ Personal Information and Sensitive Personal Data and PHI, taking into account the applicable industry standards, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for your rights and freedoms:

- That includes the prevention of their alteration, damage, loss, unauthorized processing or access, having regard to the nature of the data and the risks to which they are exposed by virtue of human action or the physical or natural environment.
- We shall comply with the security safeguards as per our contractual and statutory requirements in consultation with its internal I.T department.
- The Office of Data Privacy and Chief Information Security Officer shall assess the security measures implemented to safeguard Personal Data, Personal Information and Sensitive Personal Data on a regular basis and update the same, where required.
- All subcontractors shall be imparted with mandatory Privacy training (e.g., Training on Embedding Privacy in Software Development etc.). Further confidentiality agreements and Non-Disclosure Agreements shall be signed by all subcontractors on or before their joining date with LTIMindtree.
- We have implemented the following safeguards to ensure the Personal Data We collect, stores, processes and disclose is secure:
  - o Physical Security Controls
    - Facility Perimeter, HD access reader, Data Centre, Video surveillance
  - o IT Infrastructure Controls
    - Encryption, DLP, Data masking, controlled Portable ports, Access Control, Unauthorized software check, Data destruction, System Hygiene measures, Monitoring, User Access Management, Patch Management, Vulnerability Management.

We have implemented an incident and breach management procedure to ensure that exceptions in data privacy compliance are promptly reported to the Office of the Data Privacy and to the appointed Data Protection Officer.

## Monitoring

We have industry standard security measures assist us to keep our systems and premises secure. The security measures implemented for the processing of Personal Data either routinely or occasionally (as appropriate), include:

- Email security – We have email security measures in place that involve automated scanning of incoming and outgoing emails for potential threats. Threats, such as phishing emails or malware may be escalated to IT for consideration.
- Activity logs – We have audit trail capabilities as part of our automated systems to track who accesses and amends data. This means that we have access to information about your usage of login credentials, websites and applications, which may be referred to in the event of an issue.
- CCTV – We operate CCTV to help keep our premises secure. Images of you may be captured as part of the CCTV operation, however, we only view images where an incident has occurred.
- We may also perform aggregated non-anonymous system scans to help improve LTIMindtree’s services, tools and compliance. Any such scan will be proportional to the specific legitimate business interests of LTIMindtree and will be consistent with applicable local laws.

## Sale of Personal Data

We do not sell your Personal Data for monetary consideration. However, we may allow certain third parties (such as online advertising services) to collect your browsing activity and certain other personal data via automated technologies on our website in exchange for non-monetary consideration. We may share the categories of personal data listed below in order to improve the performance of our website, to enhance your browsing experience, to provide you a more personalized browsing experience, and to improve our advertising efforts. You can view a full listing of those third-party cookies and opt-out of their use through the ‘How do I turn off cookies?’ section in our cookie policy.

For more information regarding the above, please refer to the LTIMindtree California Privacy Statement which you can access [here](#).

# Rights of Data Subjects(Data Principals/Consumers)/What Rights do I have?

You may have certain rights relating to your Personal Data provided for under applicable law, such as the right to Request access your Personal Data and the processing activities on the Personal Data.

- Receive information regarding the processing of your Personal Data
- 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
- Request erasure of your Personal Data in certain circumstances.
- Request that the processing of your Personal Data is restricted in certain circumstances.
- Object to processing of your Personal Data in certain circumstances.
- Receive your Personal Data provided to us as a controller in a structured, commonly used and machine-readable format in certain circumstances.
- Lodge a complaint with a applicable supervisory authority.
- Object to, and not to be subject to a decision based solely on, automated processing (including profiling), which produces legal effects or significantly affects you (if applicable).

Withdraw your consent provided at any time by contacting us, where the processing is based on your (explicit) consent.

You have access to view/ extract/ rectify certain aspects of your Personal Data on the intranet portal (accessible post-onboarding). Subcontractors can access this portal available on the intranet in order to update, review or correct any information.

If you wish to receive more details or carry out any specific rectifications to your Personal Data please contact our Data Privacy Officer at [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com).

To exercise the rights outlined above in respect of your Personal Data/Sensitive Personal Data or to receive more details, you may raise a request by clicking the link: [Data Subject Request Portal](#) or by contacting [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com)

As part of processing your request, we require you to provide certain personal data about you in order to verify your identity. Additionally, in accordance with your rights, you may designate an authorized agent to make a request on your behalf, if permitted by applicable laws. In order to comply with your request, we will require the personal

data referenced above to be used for identity verification purposes, as well as the name, email address, and telephone number of your authorized agent.

LTIMindtree kindly asks you to scrupulously assess your legitimate right(s) and interest(s) before raising any official request under our platform.

For more details regarding Data Subject Rights, please refer to the Global Privacy Statement.

### 15.1 California Privacy Rights

The CCPA Regulations provide California residents with the right to request disclosure of the categories and specific pieces of Personal Information that the business collects, sells or discloses concerning California residents and we shall provide such information without charge to the requesting California resident after verifying the request. Under the CCPA Regulations, “collects” includes information bought, rented, gathered, obtained received and accessed whether actively, passively or by observing the California resident, provided, however, that we are limited in terms of what we can disclose when such information is Sensitive Personal Data.

The CCPA Regulations require that we provide data access and data portability to California residents.

Subject to certain exceptions, the CCPA Regulations grant rights to California residents to request the deletion of their Personal Information. California residents may also request correction of inaccurate or incomplete Personal Information.

The CCPA Regulations grant rights to California residents to request the details of Personal Information that is being sold or shared and to opt-out of such sale or sharing. California residents also have the right to direct us to limit use and disclosure of Sensitive Personal Information to the extent necessary to perform the services or provide the goods.

The CCPA Regulations prohibit discrimination against California residents that elect to exercise their rights under the CCPA Regulations.

The CCPA Regulations prohibit any agreement or contract that seeks to waive or limit California residents’ rights under the CCPA Regulations.

To exercise the rights outlined above in respect of your Personal Data/ Sensitive Personal Data or to receive more details, you may raise a request by clicking the link: [Data Subject Request Portal](#) or by contacting [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com). You may also contact LTIMindtree US toll-free number +1 833 968 0934.

If you have any questions or encounter any difficulties, please write to [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com)

California residents who provide Personal Information are entitled to request information about them-selves that we shared with Third Parties for their own direct marketing purposes (if applicable), including the categories of information and the names and addresses of those businesses. We do not currently share the personal

information of California residents with Third Parties for their own direct marketing purposes.

Data subject rights will be fulfilled based on the jurisdiction you belong to and if you have any specific query in relation to the same, you may reach out to us by contacting [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com).

## Country Specific Addendums

For information regarding USA, please refer to

- [“LTIMindtree California Privacy Statement”](#).

[“China Privacy Addendum”](#)

## Existence of Automated Profiling and Decision Making

We do not use your Personal Data to make decisions with legal or similar effects for you, based solely on the automated processing of your Personal Data. In case We will perform automated individual decision-making in the future, We will inform you prior to the processing and we will inform you on your rights, including your right to express your point of view and contest the decision.

## Your Duty to inform us of changes

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Artificial Intelligence (AI) Usage

LTIMindtree leverages Artificial Intelligence (AI) technologies to enhance various operational processes. This section outlines the specific uses of AI, the legal basis for processing personal information, and the guidelines for responsible AI usage within the organization.

### 1. AI in Recruitment

We utilize AI technologies, including interview bots, to assist in recruitment processes. These technologies assist in pre-screening candidates, scheduling interviews, and

conducting initial assessments and interviews which may include proctoring for integrity checks. The use of AI in recruitment aims to improve efficiency, while we also emphasize the importance of transparency and human intervention in making final decisions. Our approach ensures that a human is always in the loop, reviewing AI-generated insights and making the final hiring choices. This practice aligns with our commitment to responsible AI principles, ensuring transparency, fairness, bias mitigation and accountability throughout the recruitment process along with compliance of legal requirements.

## 2. Internal AI Usage

Employees may use AI technologies for internal purposes such as:

- Validating and authenticating documents/information
- Assistance in creating, extracting, and summarizing documents/emails through AI-powered assistants like Copilot
- AI bots for internal processes including but not limited to interviews, training, reporting, analysis, policy summarization

These technologies are intended to streamline workflows and enhance productivity.

## 3. Legal Basis for Using Personal Data

The processing of personal data through AI technologies is conducted based on the following legal bases, as applicable:

- **Consent:** Obtained from individuals for specific AI-related processing activities.
- **Legitimate Interests:** Where the processing is necessary for the purposes of legitimate interests pursued by our organization, provided these interests are not overridden by the rights and freedoms of the data subjects.

## 4. Human Oversight

All AI technologies are subject to human oversight to ensure ethical decision-making, accountability, and compliance with legal regulations and guidelines. Human reviewers are responsible for monitoring AI outputs and intervening when necessary to correct errors or biases.

## 5. Third-Party Systems and Personnel

We may engage third-party AI technologies and personnel to support our AI initiatives. These third parties are carefully evaluated to ensure they adhere to our data protection standards, applicable laws and ethical guidelines.

## 6. Data Protection and Security

We evaluate all sensitive or personal information before sharing of such information is authorized with AI technologies. This includes ensuring that no confidential or proprietary information is entered into AI technologies without proper safeguards.

## 7. Acceptable Use Policy/AI Governance

We have established an AI Policy at LTIMindtree, which defines the permissible use cases for AI within the organization. This policy highlights ethical considerations such as bias, privacy, and transparency, and outlines the process for getting new AI use cases reviewed and approved in line with responsible AI practices.

## 8. Compliance Monitoring

To ensure compliance with our AI usage policies, we have implemented monitoring mechanisms. These include regular audits, employee training programs, and the use of AI governance platforms to track AI adoption and usage.

## 9. Risk Management

We conduct risk assessments to identify and mitigate potential risks associated with AI usage. This includes evaluating the performance, security, and ethical implications of AI technologies, and taking actions as needed.

## 10. Transparency and Documentation

We maintain documentation of our AI technologies and their usage. Transparency is key to building trust with our stakeholders and ensuring accountability.

By adhering to these guidelines, we aim to use AI responsibly and transparently, ensuring that our practices align with legal requirements and ethical standards.

# Contact, Complaints and Grievances

If you have any questions, comments, or suggestions, complaints or grievances, or if you want to exercise your privacy rights or wish to raise or consult Us on any privacy issues, our use of Personal Data or Personal Information, you can contact our appointed Data Protection Officer (“DPO”).

Complaints related to Personal Data and Personal Information protection and any communications regarding enforcement of your privacy rights should be directed to the Data Protection Officer at the following contact details:

### Global Data Privacy Officer for LTIMindtree Limited:

- Jagannath PV
- Email:
  - [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com)
  - [Jagannath.PV@ltimindtree.com](mailto:Jagannath.PV@ltimindtree.com)
- Address: Data Privacy Office

Gate No. 5, L&T Technology Center, Saki Vihar Road, Powai, Mumbai – 400072

Attention : Jagannath PV (Data Protection Officer)

Phone- +91 22 67766776

**European Representative:**

- Matthias Meister
  - Email ID- dataprotectionoffice.eu@ltimindtree.com
  - Matthias.Meister@ltimindtree.com

**United Kingdom Representative**

- William Hatton
  - Email ID - dataprotectionoffice@ltimindtree.com
  - William.Hatton@ltimindtree.com

**Switzerland Representative**

Email ID - dataprotectionoffice@ltimindtree.com

**United Arab Emirates**

Email ID - dataprotectionoffice@ltimindtree.com

**South African Representative**

Email ID - dataprotectionoffice@ltimindtree.com

We will use reasonable efforts to respond your complaint within a reasonable time, usually within 30 days.

You may also raise a concern or lodge a complaint with the competent Supervisory Authority/Data Protection Authority. The name and contact details of the Data Protection Authorities in the European Union can be found [here](#).

You may reach out to the DPO Office (in the above-mentioned contact details) in the event you want a copy of this privacy notice in the local language of European countries where LTIMindtree has an office.

If you are in Australia, and we are unable to satisfactorily resolve your privacy concerns, you can contact the Office of the Australian Information Commissioner on their website [www.oaic.gov.au](http://www.oaic.gov.au)

# Changes to our Privacy Notice

This privacy notice was last updated on 18 April 2025. This notice may be revised and updated from time to time.

If you have any questions about this Notice, please contact Data Protection Officer of LTIMindtree at [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com). You may also refer to our LTIMindtree Global Data Privacy Statement and LTIMindtree California Privacy Statement published on the website for further information on LTIMindtree's commitment towards privacy.

## LTIMindtree Limited

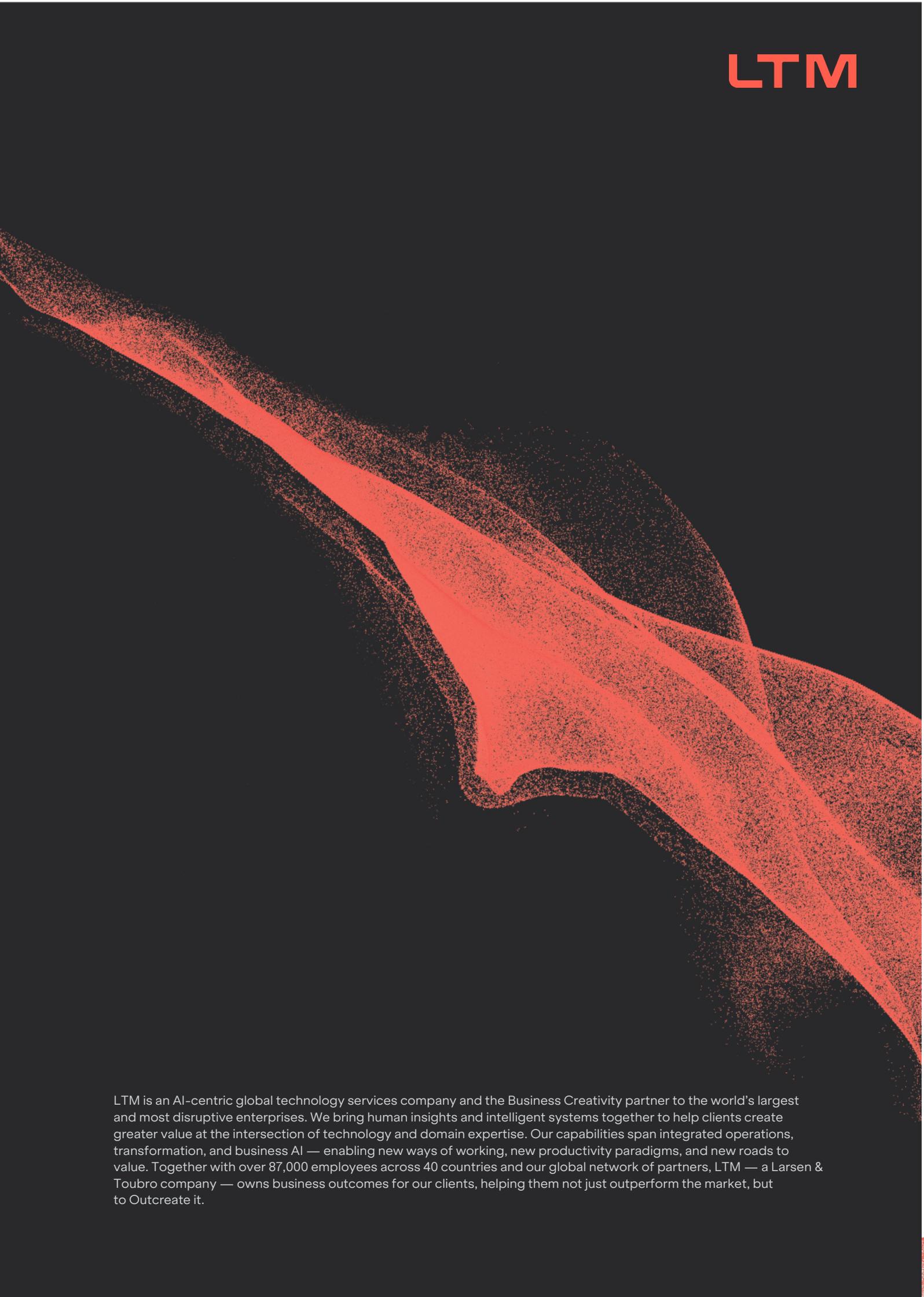
### Contact Information

Email: [dataprotectionoffice@ltimindtree.com](mailto:dataprotectionoffice@ltimindtree.com)  
Gate No. 5, L&T Technology Center,  
Saki Vihar Road,  
Powai, Mumbai – 400072

INDIA

Phone- +91 22 67766776

Web- [www.LTIMindtree.com](http://www.LTIMindtree.com)



# LTM

LTM is an AI-centric global technology services company and the Business Creativity partner to the world's largest and most disruptive enterprises. We bring human insights and intelligent systems together to help clients create greater value at the intersection of technology and domain expertise. Our capabilities span integrated operations, transformation, and business AI — enabling new ways of working, new productivity paradigms, and new roads to value. Together with over 87,000 employees across 40 countries and our global network of partners, LTM — a Larsen & Toubro company — owns business outcomes for our clients, helping them not just outperform the market, but to Outcreate it.