

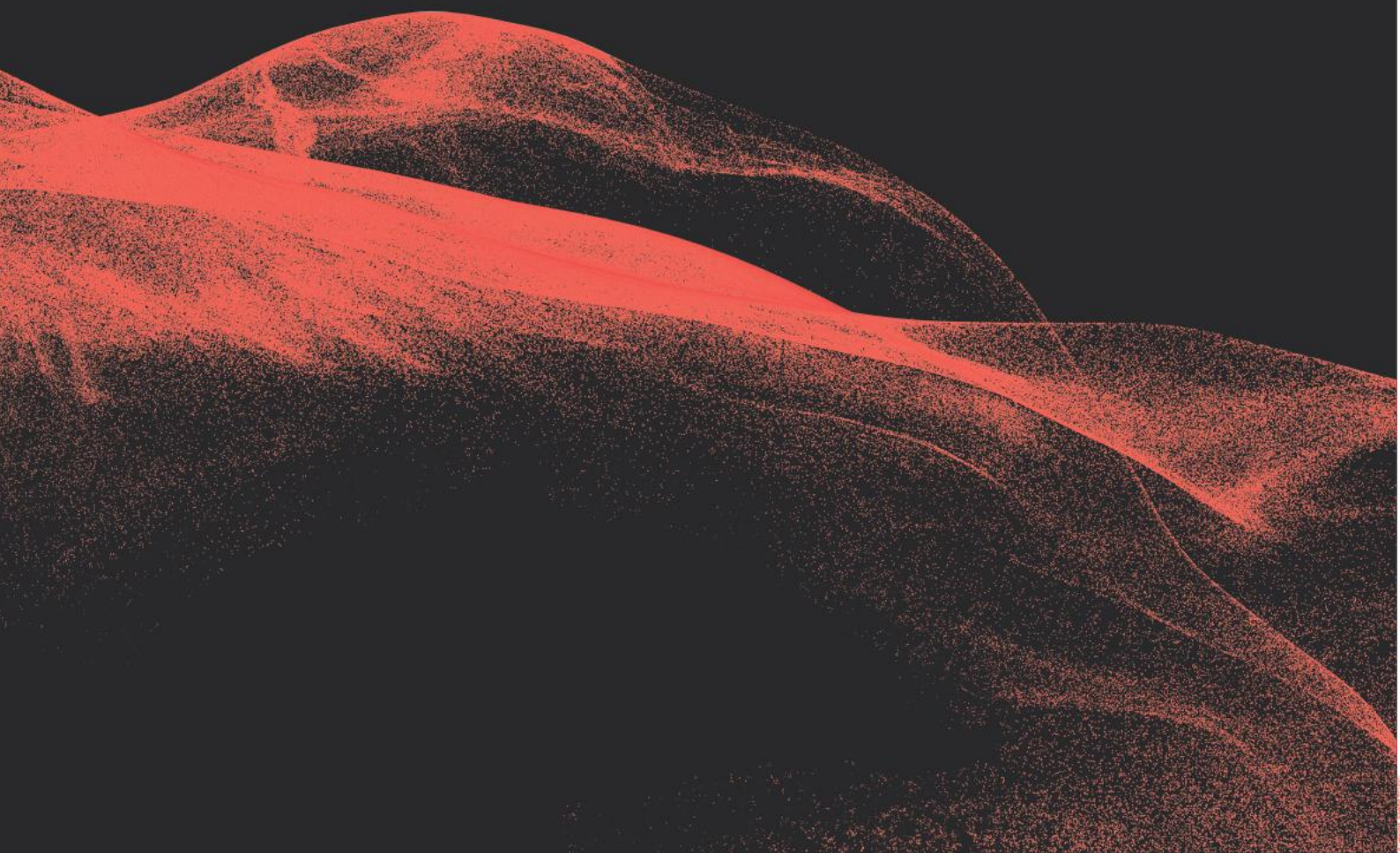


A Larsen & Toubro
Group Company

LTM

Data Privacy Notice for Visitors (Global)

Version 4.0 | 18 April | 2025



Copyright Information

This document is the exclusive property of LTM Limited (LTM); the recipient 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 LTM.

References

For more details, please refer to the following documents:

No	Document Name	Ver	Location
1.	LTM General Data Privacy Statement	2.0	https://www.ltm.com/general-privacy-policy/
2.	LTM Global Data Privacy Statement	2.0	https://www.ltm.com/ltm-external.pdf
3.	LTM Cookie Policy	2.0	https://www.ltm.com/cookie-policy/

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Introduction

For the purposes of your visit in Premises of LTM 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 and in Europe (“LTM” or the “Company” or “we” or “us” or “our”), we collect, hold, process and transfer Personal Data about you as it is necessary for the administration, management and performance of the purpose (as detailed in “Purpose and legal basis of Processing” section).

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. LTM, 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 LTM’s data processing and business operations) (the “Data Privacy Laws”).

For the purpose of this form, “Premises” means the premises of LTM that you are visiting.

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 visitors including but not limited to clients, job applicants, employees, third party service providers, vendors, suppliers, guests, trainers, employee’s family members etc. visiting our offices. This Notice does not form part of any contract of employment or other contract to provide services. It covers Personal Data and Personal Information disclosed by you which is Processed by LTM during the course of your interaction with us.

Role: LTM acts as a Data Controller (as defined below) with respect to any Personal Data and Personal Information it holds about you. LTM is responsible for ensuring that it uses Personal Data and Personal Information 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.

We need to keep and process data about you for acceptable business and security purposes, for complying with legal obligations and for record keeping purposes. The data we hold, and process will be used for management, operational and administrative purposes 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 would be associated with us, at the time when your association ends and after you have left 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. LTM does not collect Personal Data from Chinese residents that are under the age of 14.</p>

<p><i>Personal Information (applicable only to California residents) (under US laws)</i></p>	<p><i>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 “de-identified” or “aggregate customer information” as those terms are defined pursuant to the CCPA Regulations. LTM does not collect Personal Information from California residents that are under the age of 16.</i></p>				
<p><i>Sensitive Personal Data (including specific categories of Personal Data under GDPR)</i></p>	<p><i>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). .</i></p>				
	<p><i>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 or involve a serious risk for the data subject are also considered as sensitive data.</i></p>	<p><i>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 or criminal sanctions.</i></p>	<p><i>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 personal dignity of a natural person or harm to personal or property safety, such as information on biometric identification, financial accounts, personal whereabouts and personal information of minors under the age of 14.</i></p>	<p><i>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 LTM is not an intended.</i></p>	<p><i>In Denmark only: Information on social security numbers and criminal offences are not considered as sensitive personal under the GDPR but constitutes its own category of information. Processing of this requires specific legal basis under the Danish data protection act.</i></p>
<p><i>Process, Processes, Processed or Processing</i></p>	<p><i>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.</i></p>				

Consent	Means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which the Processing of their Personal Data, Personal Information and/or Sensitive Personal Data via a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data, Personal Information and/or Sensitive Personal Data relating to him or her.
Data Subject	Means to 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 Notice, "Data Subject" means LTM current and previous employees, prospective candidates, current, prospective and previous customer personnel, current and previous partner/vendor personnel, website visitors, sub-contractors and visitors. LTM does not generally process Personal Data/ Personal Information and Sensitive Personal Data 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 Regulations, Data Subject shall include California residents. With respect to Chinese residents, LTM 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
Third Party	In relation to Personal Data or Personal Information means a natural or legal person, organization, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the Data Controller or Data Processor, are authorized to process personal data;
"Sell," "selling," "sale," or "sold,"	Means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Data or Personal Information by the business to another business or a Third Party for monetary or other valuable consideration.
"Share " or "Sharing" (For California residents)	Means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal Information by the business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged.
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.LTM.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

LTM collects from you only necessary personal data directly from you to the extent legally justified as per the “Purpose and legal basis of Processing” section and/or permitted by applicable local law. The categories of personal data that are typically collected and processed are:

- Name, address, telephone number, email address and contact details.
- Your any one of government identification (if applicable).
- Time of entering and leaving the premises.
- Photograph if needed to provide temporary access card.
- CCTV footage of you in the LTM premises, for the protection of our property and for health and safety reasons.
- Network usage details when you connect to our Wi-Fi network
- We may process personal information of individual(s) below the age of 18, when they accompany you or come to visit you. In such cases the information being entered by you is being entered willfully by you and you are responsible for the correctness of the information being entered. You have a choice not to enter Children information if you choose to. If you choose not to enter Children information, please note LTM will not be able to provide access to its facilities as a visitor.
- No sensitive personal information will be collected by us.
- LTM 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 LTM 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 LTM.
- In order to validate your identity, LTM 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.

These information would be collected by us directly from you.

How we collect your Personal Data and Personal Information

We collect personal data about visitors through visitor’s registers/manuals maintained at the reception directly from the visitors. Details such as CCTV footage and related to

network usage are collected indirectly. We may collect additional personal data in the course of business, if required. All data collected as a part of the visitor entry process or additional data collected, if any, will be used and stored for office security purposes and for complying with our legal obligations or legitimate interests.

Purpose and legal basis of Processing

We, at LTM, are required to keep and process your personal information for the purposes of your visit to LTM's Premises. We shall use your personal information, pursuant to your consent, on legitimate interest, and in compliance to applicable laws and regulations. Your consent includes for evaluating your personal information for security purposes within our Company. Your personal information shall be utilized in the following ways:

- Communicating with you or law enforcing authorities, in context of security purposes,
- Administrative and hospitality purposes like providing access to premises, Wi-Fi, refreshments etc
- Monitoring the security of our premises including the need to comply with the applicable law
- 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 absolutely necessary is processed during such audits in order to comply with applicable laws, defense or exercise of our legal rights and to purpose the legitimate business interests.

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

No sensitive personal information will be collected by us.

Personal Data of Individuals below 18 years

We may process personal information of individual(s) below the age of 18, when they accompany you or come to visit you. 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.

In such cases the information being entered by you is being entered willfully by you and you are responsible for the correctness of the information being entered. You have a choice not to enter Children information if you choose to. If you choose not to enter Children information, please note LTM will not be able to provide access to its facilities as a visitor.

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

- We may use carefully selected third parties to carry out certain activities to help us to run our business (such as security agencies, building operators, administration and facilities operation, front desk) and to facilitate audits (third party auditors).
- 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. Your information would be shared with our internal staff for screening and interview purposes. 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.

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 LTM Retention Policy.

Cross Border Transfer

We are part of Larsen and Toubro Group (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 LTM 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 LTM 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 on dataprotectionoffice@ltm.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 Statement 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 LTM.
- We have implemented the following safeguards to ensure the Personal Data We collect, store, process and disclose is secure:
 - Physical Security Controls
 - Facility Perimeter, HD access reader, Data Centre, Video surveillance
 - 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 LTM's services, tools and compliance. Any such scan will be proportional to the specific legitimate business interests of LTM and will be consistent with applicable local laws.

Sale of Personal Data

We do not sell your Personal Data for monetary consideration.

If you fail to provide your Personal Data

If you do not provide this data:

- we may not be able to allow you into our premises and use the required facilities
- 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.

Rights of Data Subjects(Data Principals/Consumer)/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.

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@ltm.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@ltm.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.

LTM 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 Data Privacy Statement that can be accessed [here](#).

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.

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

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@ltm.com. You may also contact the LTM US toll-free number +1 833 968 0934.

If you have any questions or encounter any difficulties, please write to dataprotectionoffice@ltm.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@ltm.com

Country Specific Addendums

For information regarding USA, please refer to

- [“LTM California Privacy Statement”](#)
- [“China Privacy Addendum”](#)

Existence of Automated 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

LTM 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 LTM, 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 Details, 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 LTM Limited:

- Jagannath PV
- Email:
 - dataprotectionoffice@ltm.com
 - Jagannath.PV@ltm.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@ltm.com
 - Matthias.Meister@ltm.com

United Kingdom Representative

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

Switzerland Representative

Email ID - dataprotectionoffice@ltm.com

United Arab Emirates

Email ID - dataprotectionoffice@ltm.com

South African Representative

Email ID - dataprotectionoffice@ltm.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 LTM 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.

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 LTM at dataprotectionoffice@ltm.com. You may also refer to our LTM Global Data Privacy Statement and LTM California Privacy Statement published on the website for further information on LTM's commitment towards privacy.

LTM Limited

Contact Information

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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.