

# Recruitment Privacy Notice

## Coforge Recruitment Privacy Notice

Coforge Ltd. and its affiliates' (hereafter referred as 'Coforge', 'we' or 'us') is committed to protecting your information by handling it responsibly and safeguarding it using appropriate technical, administrative, and physical security measures.

This Recruitment Privacy Notice covers any individual who submits personal information to Coforge when applying for employment and also to all Personally Identifiable Information (PIIs) that Coforge collects in connection with your job search and our recruitment process.

### What Personal Data Coforge will collect?

We typically collect the personal data such as Name, address, telephone number, email address, contact details, age, education, qualification and work experience details, references and other Personal Information you provide in your application form, covering letter, CV or Resume, screenshot of the interview session and interview feedback.

We may collect some more information like date of birth, gender and Sensitive personal data about a candidate (such as health, passport number etc.) to the extent permitted to do so by applicable laws and to support our efforts to create an inclusive and diverse work environment. We may also collect sensitive personal data to the extent that a candidate chooses, without being asked, to voluntarily disclose during the recruiting process.

We may conduct background vetting checks including criminal records and work status checks etc., where permitted by local law.

### How is your Personal Data collected?

We collect your personal data through:

- Online Application Forms: Applicants submit information electronically.
- Job Referrals: Job referral by Coforge employees.
- Resume and Cover Letter: Candidates provide details in their application documents.
- Interviews: Information is gathered through face-to-face, phone, or video interviews.
- Assessment Tests: Data is collected from aptitude, personality, or skills tests.
- Background Checks: Information is obtained from third-party verification services.

## **How Coforge uses your personal information and the legal basis for processing?**

Coforge shall use your personal information pursuant to legitimate interest and in compliance to applicable laws and regulations. We will use your personal information for legitimate human resources and business management purposes, including:

- To assess your application for the job offered and to communicate with you within the recruitment process.
- Evaluating your suitability for a role at Coforge.
- To contact you in case of an alternative/future career opportunity within the Coforge
- To contact you following your unsolicited application.
- Carry out background and reference checks, where applicable.
- Keep records related to our hiring processes.
- General HR administration and management
- Comply with legal/regulatory or audit requirements.

In future, if we intend to process your personal data for a purpose other than that mentioned above, we will provide you with any other relevant information and notify you if required under law.

## **Profiling and Automated Decision Making**

Coforge does not use any automated decision making (including profiling) in relation to your application without human involvement.

## **Whom do we share your personal data with?**

We may share your personal information within our group companies and individuals inside the Coforge for business, administrative and personnel management purposes. We may also share some of your data with third parties who provide services to us such as recruitment agencies, consultants, background check services and professional advisers. We will always seek to ensure that any third parties who handle your personal information will do so in a manner consistent with this Recruitment Privacy Notice and in accordance with applicable law. If it is required for your role, your CV's and business contact details may be shared with customers.

## **Where do we transfer your personal data?**

We transfer personal data concerning you to countries where Coforge has operations, and particularly India. Your personal data may be accessed by recruiters and interviewers working in the country where the position for which you are applying is based.

When Coforge transfers your personal data outside the originated country or outside of your country of residence, Coforge will impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the applicable data protection laws. Coforge will ensure that any international transfer of personal data is carried out in compliance with applicable data protection laws.

## How long Coforge keep your Personal Data?

We keep your personal information for as long as is necessary for the purposes identified above. If you are hired, this will be the duration of your employment plus a period to fulfil any post-employment obligations. For unsuccessful candidates, any Personal Data collected during the application process will be securely disposed post our defined data retention timelines.

## How Coforge protects your personal data?

We use a range of measures to ensure we keep your personal data secure, accurate and up to date. These include but not limited to:

- education and training to relevant staff to ensure they are aware of our privacy obligations when handling personal data;
- administrative and technical controls to restrict access to personal data to a 'need to know' basis;
- technological security measures, including fire walls, encryption and anti- virus software;
- we may apply pseudonymisation, de-identification and anonymisation techniques in efforts to further protect personal data; and
- physical security measures, such as security passes to access our premises.

The transmission of data over the internet (including by e-mail) is never completely secure. So although we use appropriate measures to try to protect personal data, we cannot guarantee the security of data transmitted to us or by us.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## What are your Rights in connection with Personal Data?

You have the following rights, which may be exercised in accordance with applicable data protection law with respect to the PI/SPI that you have shared:

- **Right to be informed** about the collection and use of your PI/SPI
- **Right to Access** - You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- **Right to Rectify** – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- **Right to Erasure** – You can ask us to erase (delete) your personal data in certain circumstances.
- **Right to Restriction of Processing** – You can ask us to restrict our processing of your personal data in certain circumstances.
- **Right to Data portability** – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if is technically feasible.
- **Right to Object to Direct Marketing including Profiling** – You can object to our use of your personal data for direct marketing purposes, including profiling. We may

need to keep some minimal information to comply with your request to cease marketing to you.

- **Right to Withdraw Consent** – You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.
- **Right of no Retaliation (non-discrimination)** - Coforge does not discriminate against you or take adverse action against you for exercising any of your (Data Subject) rights under the CCPA, CPRA, or any other data privacy law.
- **Transmissibility of Rights of the Data Subject/Right to Nominate** - Coforge shall assist the lawful heirs and assigns of the data subject to invoke the rights of the data subject at any time after the death of the data subject or when the latter is incapacitated or incapable of exercising his or her rights.
- **Right to damages** – You have the right to be indemnified for damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of personal data.
- **Right to log complaint** – You can lodge a complaint with Coforge Limited Data Protection Officer via an email to [dpo@coforge.com](mailto:dpo@coforge.com). You can also lodge a complaint as a third-party beneficiary with the data protection authority of your respective country.

You can exercise your data protection rights by sending a mail to [dpo@coforge.com](mailto:dpo@coforge.com).

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

## Do we use Cookies?

Our websites may use cookies. Where cookies are used, a statement will be sent to your browser explaining the use of cookies. To learn more, please refer to our cookie policy.

## Marketing

If you do not wish to receive marketing communications from Coforge, you can unsubscribe from the link in the email you received, change your communication preferences within Coforge, or indicate your communication preferences within the direct communication from us. Keep in mind, Coforge does not sell or rent your personal information to third parties for their marketing purposes without your explicit consent

## Changes to this privacy statement

From time to time we may update this statement. When we do, we will publish the changes on this Website. If you do not agree with these changes, you should discontinue your use of our Website. If material changes are made to this Statement, we will notify users by e-mail or by placing a prominent notice on this Website.

This Privacy Policy was last updated 10<sup>th</sup> Aug 2024.

**How to contact us**

For any question, comment, complaint or wish to access a copy of your personal data or to correct it if you believe it is inaccurate, contact us at :

Coforge Data Protection officer : [dpo@coforge.com](mailto:dpo@coforge.com).

For EU/EEA specific privacy concerns, queries or request : [EURep@coforge.com](mailto:EURep@coforge.com).