

1 PURPOSE

CoreEL Technologies India Private Limited (“Company/ “We”/ “Us”) is sensitive to the rights of our employees, contingent workers, consultants and contractors in relation to their privacy and use of their personal information (“Personal Information”). Accordingly, we collect, process, and disclose Personal Information (*as defined below*) relating to prospective, current, and former employees in a manner consistent with the law. The purpose of this document is to set forth the policy with respect to handling and dealing with Personal Information of Data Principals (*as defined below*). This policy is in conformance with prevalent Indian law, CoreEL Code of Business Conduct, and Company’s privacy policies, principles, and standards.

2 SCOPE

This policy on data privacy (the “Policy”) governs the collection, processing, storage and protection of Information of employees, consultants, contingent workers received by CoreEL Technologies India Private Limited including in digital and non-digital formats.

3 POLICY

3.1 DEFINITIONS

For purposes of this Policy, the following definitions shall apply:

- **"CoreEL" or "the Company"** means CoreEL Technologies India Private Limited.
- **"Data Principal"** means an employee, candidate for employment, apprentice, contingent worker or contractor of CoreEL.
- **"Personal Information"** means any information that relates to a natural person that, either directly or indirectly, either alone or in combination with other information available or likely to be available, is capable of identifying such person. For the purposes of this Policy, unless otherwise stated, “personal information” includes “sensitive personal information”, as defined below.
- **"Sensitive Personal Information"** consists of data relating to passwords, financial information including but not limited to bank account details, physical, physiological and mental health condition, medical records and history, sexual orientation, marital and biometric information of employees and family members.

Provided that any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law in effect shall not be regarded as Personal Information or Sensitive Personal Information for the purposes of this Policy.

3.2 PRIVACY PRINCIPLES

The privacy principles outlined in this Policy have been developed in compliance with applicable data protection laws currently in force in India. The Company shall all times ensure that the Personal Information is handled lawfully, fairly, and transparently. The Company shall collect Personal Information for legitimate business purposes, process the same for lawful purposes, and safeguard the Personal Information against unauthorized access, loss, or misuse.

The Company shall have the right to amend or replace this Policy and the security practices and procedures from time to time at its sole discretion and provide details of such amended or replaced practices and procedures. Notwithstanding anything to the contrary contained in this Policy, the publication of such practices and procedures on the Company intranet shall be deemed to incorporate such practices and procedures in this Policy.

CoreEL Technologies India Private Limited shall, to the extent required by applicable law, minimize the collection of Personal Data and ensure that Data Principals have a clear and accessible process to withdraw their consent at any time.

3.3 PURPOSE OF PERSONAL INFORMATION COLLECTION

The Company collects, processes, and stores Personal Information of Data Principal strictly for employment-related purposes, including but not limited to identity verification, background verification, payroll processing, statutory compliance, performance management, workplace security, and any other legitimate business needs.

3.4 TYPES OF PERSONAL INFORMATION COLLECTED

The specific Personal Information collected by the Company is set forth in the Declaration form annexed to this Privacy Policy.

The Personal Information collected may include details such as (name, date of birth, contact details), financial information (bank account details for salary processing), health data (for insurance and wellness programs), professional records (academic grade sheets, employment history, performance reviews), and any other data necessary to comply with applicable legal and regulatory requirements.

3.5 LAWFUL BASIS FOR PROCESSING

Personal Information is collected and processed based on the Data Principal's consent as provided in your offer acceptance and for legitimate purposes of the Company to facilitate HR, administrative and allied functions, in accordance with applicable Indian data protection laws.

3.6 PERSONAL INFORMATION STORAGE AND RETENTION

The Company ensures that Personal Information is securely stored and retained only for the duration necessary to verify your background, fulfil employment-related purposes or as mandated by applicable laws and regulatory requirements. Personal Information will be securely disposed of after the retention period expires.

3.7 PERSONAL INFORMATION SHARING AND DISCLOSURE

Personal Information may be shared with third-party service providers (such as payroll processors, insurance companies, and regulatory authorities) only for legitimate purposes, ensuring adherence to Indian data protection laws. Any data sharing is done with appropriate security safeguards in place, and the Company ensures that such third parties shall maintain confidentiality and ensure security of such Personal Information.

3.8 RIGHTS OF DATA PRINCIPAL

Data Principals have the right to access, correct, update, or request deletion of their Personal Information, subject to applicable legal and business requirements. Data Principal's also have the right to withdraw consent for data processing, where applicable. Any requests should be directed to the Company's designated officer, Head HR at Suchitra.thyagaraj@coreel.com

3.9 SECURITY MEASURES

The Company employs reasonable security safeguards to protect Personal Information as mandated under applicable laws.

3.10 CROSS-BORDER DATA TRANSFERS

If Personal Information needs to be transferred outside India, the Company ensures compliance with applicable data protection laws and adopts necessary contractual and security measures, including obtaining explicit consent where required.

3.11 DATA BREACH NOTIFICATION

In the event of a data breach of such Personal Information that may impact the Data Principal's rights, the Company will take necessary remedial actions and notify relevant parties as per legal requirements under Indian law.

3.12 POLICY UPDATES AND COMPLIANCE

The Company may update its data protection practices from time to time in line with legal and regulatory changes. Data Principal's will be informed of any significant changes to these practices. Compliance with this Annexure and the Company's internal privacy policies is mandatory for all Data Principal's.

3.13 REPORTING POTENTIAL POLICY VIOLATIONS AND POTENTIAL PRIVACY INCIDENTS

Data Principals are required to immediately report any potential policy violations as well as suspected or actual unauthorized use, access, or disclosure of Personal Information (whether inadvertent or intentional). Potential policy violations and potential privacy incidents must be reported by:

- Sending an email directly to hrd@coreel.com
- CoreEL Technologies India Private Limited investigates any potential or actual policy violations and privacy incidents in compliance with applicable company policies and procedures, laws, and regulations. In the event that CoreEL Technologies India Private Limited shares, directly or indirectly with the relevant individuals, any Personal Information, the said individuals will be obligated, to use such Personal Information in accordance with the data security practices and procedures and internal privacy policy of CoreEL Technologies India Private Limited. Further, such Personal Information shall be used only in the course of employment and not for any personal use of the individual. In case of unauthorized use by the individual of such Personal Information, CoreEL Technologies India Private Limited reserves the right to take disciplinary action including termination of the individual's employment at its sole discretion after providing him/her with a reasonable opportunity to be heard.

3.14 EXCEPTION

Any exceptions to the policy must be approved by Managing Director

3.15 COMPLIANCE

All Data Principal's having care over personal information must comply with the policies, procedures and practices as described in the policy. Breach of any term or condition of this privacy policy, whether intentional or unintentional, including but not limited to the unauthorized disclosure of personal information is grounds for disciplinary action up to and including the immediate termination from employment/contract of any or all responsible Data Principal.

All Data Principal are expected to sign a declaration form (Annexure I – Declaration) giving their consent to share Personal Data as per this Guideline

For CoreEL Internal Use Only

4 REVISION HISTORY

Version #	Description of changes	Approval	Date of release
1.00	New Policy	MD	06-Feb-2025

Annexure

DECLARATION OF CONSENT BY DATA PRINCIPAL

I, [Employee/contractor Name], hereby acknowledge and consent to the collection, storage, disclosure, and transfer of my Personal Information by CoreEL Technologies India Private Limited as outlined in the company's Privacy Policy.

I, [Employee/contractor Name], also acknowledge that I have provided my Personal Information previously to the Company and I have consented to the Company's collection, storage, disclosure and transfer of such Personal Information.

I understand that for purposes of engagement with the Company, I have previously provided and will be required to provide the following information which includes:

- Medical records and health information
- Biometric data
- Financial details (bank account information, salary details)
- Passport and other government identification details
- Caste or tribal origin

I agree that my Personal Information was previously collected, processed, and used for the following purposes and the Company shall continue to process my Personal Information for the following use cases:

- To facilitate employment-related activities, including recruitment, onboarding, performance evaluation, payroll, and benefits administration
- To comply with legal and regulatory requirements
- To manage employee health and safety concerns, including medical emergencies
- To conduct internal investigations as needed
- To provide necessary training and development opportunities

I further understand that:

- My Personal Information has been treated and will continue to be treated with the utmost confidentiality and at all times the Company shall ensure there are adequate security measures to protect it.
- The company will only disclose my Personal Information to authorized personnel within the company or to third-party service providers as necessary for the purposes outlined above, and with appropriate confidentiality agreements in place. I also acknowledge that I am aware that the Company has previously disclosed my Personal Information to authorized personnel within the Company or to third-party service providers as necessary for the purposes outlined above, and with appropriate confidentiality agreements in place and I have provided my consent for the same.
- I have the right to access, rectify, and request the deletion of my Personal Information, subject to applicable laws and company policies.



Title: Employee Personal Data Privacy Policy	Version: 1.00
Owner: HRD Team	Release Date: 06-Feb-2025
Approver: Managing Director	Document ID: CRL-POL-052

- I can withdraw my consent at any time by providing written notice to the Company, however, this may impact my employment depending on the nature of the information and the reason for withdrawal.

By signing below, I confirm that I have read, understood, and agree to the terms of this consent letter:

Signature: [Employee Signature]

Date: [Date]