



Standard Operating Procedure n°	PO 28 - PR 3
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<b>Recruitment Privacy Notice - Template</b>	
Valid from: February 2022	Related Policy: Privacy Policy – PO 28

**Reviewed by**

Group CLO / Group CIO

**Approved by**

Group CEO

**APPLICATION**

**This notice (hereafter the “Notice”) is a template of a recruitment privacy notice.**

Each Aliaxis legal entity/affiliate is therefore responsible for completing, implementing and, if needed, adapting this Notice in compliance with applicable local laws and within the framework of its corporate legal independence.

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## 1. Purpose of this Notice

This Notice is valid as of February 2022.

This Notice sets out the personal data that we collect and process about you, the purposes of the processing and the rights that you have relating to it.

Should you have any questions regarding the applicable standards, or any comments or complaints about this Notice, please contact us as explained under section 5 below.

## 2. Data controller

The data controller of your personal data will be:

**Ashirvad Pipes Pvt. Ltd., #4B, Attibele Industrial Area, Hosur Road, Bengaluru – 562107  
Karnataka, INDIA.**

## 3. Processing of personal data

### 3.1. Types of personal data that we may collect

"**Personal Data**" means any information about an identified or identifiable natural person. An identifiable person is someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, 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.

The types of Personal Data we process about you include, but are not limited to: identification data and contact details (such as name, home address, telephone number, personal email address, date of birth), photo, civil status, education, qualifications, details about professional life, details about personal life, financial information, proof of eligibility to work, and any other information which you may voluntarily disclose.

Personal Data may be collected by different means, including:

- Contact or application forms that are completed on our website;
- resumes and references;
- personal contacts (e.g. phone calls, emails and interviews); and
- interview reports and/or assessments and evaluations.

In most of the cases, we will collect your Personal Data directly from you, however, it may be sometimes obtained indirectly from:

- public sources (e.g. LinkedIn or freely accessible social media); and
- third parties (e.g. recruitment agencies, interim agencies, assessment partners, ...).

### 3.2. Sensitive personal data

We do not collect or process any sensitive personal data, such as information relating to an individual's race or ethnic origin, political or philosophical opinions, religious beliefs, physical or mental health or condition, sexual life, preference or orientation, trade union membership or affiliation, biometric data, genetic information, commission or alleged commission of a criminal offence and any related legal actions or past convictions. If, due to specific circumstances, we need to collect such data, your explicit prior written consent will be asked.

Please note that by providing us with unsolicited sensitive personal data, you consent to the processing of such data for recruitment purposes.

### 3.3. Purpose and lawfulness of the processing

We process your Personal Data for recruitment purposes, to register and process your application for a position within our company and/or other Aliaxis companies. We will process all the necessary Personal Data that is required for us to evaluate your application for such position.

In case we decide to make you an employment offer, we may also use your Personal Data to prepare an employment offer / contract.

The processing of your Personal Data is therefore based on Aliaxis' legitimate interests (i.e. to assess you before making an offer of employment).

### 3.4. Disclosures of Personal Data

We make sure to grant access to Personal Data **only** to our employees who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. In case we disclose your Personal Data to another entity of Aliaxis Group or a third party, we will take all necessary steps to ensure an adequate level of protection of such data.

In particular, your Personal Data may be disclosed to the following categories of recipients:

- a) **Other Aliaxis companies:** we may share your Personal Data with other entities within Aliaxis Group to perform recruitment activities (e.g. if employees from other Aliaxis companies are involved in your recruitment process);
- b) **Third party service providers:** we may also make available certain Personal Data to third parties who provide services to us, such as assessment agencies. We may also disclose Personal Data to external consultants, lawyers and advisors on a need-to-know-basis.
- c) **Other third parties:** we may also disclose Personal Data to other third parties on other lawful grounds, including:
  - where we are legally compelled to do so (for instance, to comply with valid legal processes such as search warrants, subpoenas or court orders, etc.);

- such disclosure is required for the purpose of providing services and/or information to you; or
- with your prior consent.

### **3.5. International transfers of Personal Data**

Our Group operates at a global level and, as a result, we may need to transfer Personal Data to other Aliaxis companies or third-party service providers located in countries other than the ones in which your Personal Data was originally collected.

For example, we may need to transfer Personal Data to other countries for assessment purposes or other services related to the recruitment process. In such case, we will implement appropriate safeguards to ensure that an adequate level of protection for any Personal Data transferred.

Where the transfer relates to Personal Data of European residents to countries outside the European Union (EU) and European Economic Area (EEA), we will take the required measures to provide an adequate level of data protection under EU law, such as entering into EU standard contractual clauses with the party who is receiving the data

### **3.6. Protection of the Personal Data**

We are committed to ensuring the protection of your Personal Data. In order to prevent unauthorised access or disclosure or any other unlawful form of Processing of Personal Data, we have set up appropriate physical, technical and procedural measures to protect the Personal Data in our possession.

Access to Personal Data is restricted to authorised Aliaxis' employees only to fulfil their job responsibilities. Furthermore, we have implemented appropriate technical measures including but not limited to access authorisation, authentications, firewalls, anti-virus measures, back-up, and disaster recovery plans, which are designed to provide a level of security appropriate to the risk of Processing your Personal Data.

### **3.7. Retention and Deletion of Personal Data**

We shall retain your Personal Data in accordance with applicable laws and only as long as it is necessary to fulfil the purposes described above. Generally, this means your Personal Data will be retained:

- If the recruitment process results in an employment relationship, we will retain your Personal Data until the end of your employment or work relationship with us in accordance with our Employee Privacy Notice.
- If the recruitment process does not result in an employment or work relationship, we will retain your Personal Data for a maximum period of one year after the end of the recruitment process, in order to be able to contact you if a future position would match with your profile.

At the end of the retention period, we will make sure that your Personal Data is deleted or anonymised, or if this is not possible (for example, because the Personal Data has been stored in backup archives), then we will securely store the Personal Data and refrain from any further processing activity.

#### **4. Data privacy rights**

You have the following rights:

- the right to obtain confirmation as to whether or not your Personal Data are being processed and, where that is the case, the right to access and/or receive a copy of your Personal Data;
- the right to rectify or update any inaccurate or incomplete Personal Data;
- the right to obtain the erasure of your Personal Data;
- the right to restrict the processing of your Personal Data on certain legal grounds;
- the right to object to the processing of your Personal Data on grounds relating to your particular situation, where such processing is necessary for the purposes of our legitimate interest;
- the right to receive your Personal Data in a structured, commonly used and machine-readable format and have your Personal Data transmitted to another controller where the processing is carried out by automated means and based on your consent;
- the right to withdraw your consent at any time if the processing of Personal Data is based on your consent. Withdrawing consent will not affect the lawfulness of any processing that is conducted prior to such withdrawal, nor will it affect the processing of Personal Data conducted in reliance on lawful processing grounds other than consent; and
- the right to lodge a complaint with a competent data protection authority.

If you wish to exercise any of the rights above, please contact us as described under Section 5 below. We will respond to all requests we receive in accordance with applicable data protection laws.

#### **5. Inquiries or concerns**

If you have any questions or concerns regarding the manner in which we process Personal Data, or for any further information about this Notice, or if you wish to exercise your data privacy rights, please contact our Data Protection Coordinator: [privacy@ashirvad.com](mailto:privacy@ashirvad.com)

#### **6. Updates to this Notice**

This Notice may be periodically updated to reflect any necessary changes in our privacy practices. The date of the last update is indicated in the first section of this Notice.