

Recruitment Privacy Notice

1. Who this notice applies to

This Privacy Notice applies to individuals who apply for, enquire about, or are considered for roles with Lloyds Offshore Global Services Private Limited (herein referred to as the “Company”, “us”, “we”, “Data Fiduciary”, or “GSL”) through our recruitment channels (collectively, “Individuals”, “you”, “your”, “Data Principal”, or “Candidates”).

For the recruitment activities described in this Notice, GSL acts as the Data Fiduciary under the Digital Personal Data Protection Act, 2023 ("DPDPA"), determining the purpose and means of processing your personal data.

This notice can be read together with the Lloyds Technology Centre Website Privacy Notice, which provides additional information on general data processing practices.

2. What this notice covers

This Notice provides information on how we collect, use, store or otherwise process personal data in connection with recruitment activities, including but not limited to:

- Submission of job applications and expressions of interest, including through recruitment platforms or links provided to candidates, where applicable following acknowledgment of this Privacy Notice
- Review and evaluate resumes or curricula vitae and candidate shortlisting
- Interviews (virtual or in-person)
- Assessments, screening and background verification communication with candidates
- Maintaining talent pools for future opportunities, where applicable

3. Personal data we process

Depending on the role applied for and the stage of the recruitment process, we may collect and process the following categories of personal data:

- Identification and contact details
- Resume or curricula vitae, education, qualifications, and work history
- Interview notes, assessment results, screenshots (captured solely for candidate identity verification to ensure that the same individual who attended the interview is progressing to or joining the organization), and evaluation feedback
- Information voluntarily provided by candidates during recruitment interactions
- Technical information relating to the use of recruitment platforms or portals
- Identity verification
- Right-to-work checks
- Educational and professional qualification verification

- Employment history and reference checks
- Criminal, financial, or regulatory checks (where permitted by law)
- Ongoing or repeat screening where required by role, policy, or regulation

We will only process personal data that is necessary, relevant, and proportionate for the recruitment purpose.

Personal data is collected directly from candidates, through recruitment platforms and systems, and from authorised third parties, such as recruitment agencies, references and background screening providers, where permitted by applicable law.

Access to personal data is restricted to authorised personnel on a need-to-know basis for recruitment, legal, regulatory, audit, compliance and related support activities. Personal data is stored in Company-approved systems and repositories and retained in accordance with applicable legal, regulatory and internal record retention requirements.

4. Why we use your personal data

We process your personal data for the following purposes:

- To assess suitability for current or future roles
- To manage and administer recruitment processes
- To communicate with candidates regarding applications and opportunities
- To improve the efficiency, fairness, and effectiveness of recruitment activities
- To verify information provided during the application or engagement process
- To assess suitability for roles involving trust, security, or regulatory responsibilities
- To comply with applicable legal, regulatory, contractual, audit, and Group policy requirements
- To protect GSL, its colleagues, customers, and assets from risk

5. Lawful basis for processing

We process personal data under **legitimate uses** allowed by the DPDPA.

6. Who do we share your personal data with

We may share your personal data with the following recipients, but only where needed for the recruitment process and other permitted purposes:

- Internal HR, recruitment, hiring and support teams
- Group entities
- Interviewers and decision-makers involved in the recruitment process
- Authorized third-party service providers supporting recruitment platforms, assessments, scheduling, identity verification, background screening and other recruitment-related activities.
- Regulators or authorities, where legally required

We require these recipients to keep personal data secure and to use it only for specified recruitment purposes. Data is only shared with third parties under a valid contract ensuring sufficient security controls are employed by the recipients.

7. How long do we keep your personal data

We retain recruitment-related personal data only for as long as necessary to:

- Complete recruitment activities.
- Consider candidates for future opportunities where applicable; and
- Comply with legal, regulatory, audit, and record-keeping requirements.

Retention periods are determined based on legal requirements, business needs, and internal data retention policies.

Upon expiry of the retention period, personal data will be securely deleted, anonymized, or de-identified.

8. International transfers

In some cases, your personal data may be processed or accessed by authorized teams or service providers and Group entities located outside India. Where this occurs, appropriate safeguards are applied in accordance with applicable data protection laws and Group data protection standards.

9. Your rights

a) **Right to access information about personal data:** You have the right to access information about the personal data processed by us, including where such personal data is processed on our behalf by a third party.

b) **Right to correction and erasure of personal data:** You have the right to request correction, completion, updating, and erasure of your personal data processed by us, including where such personal data is processed on our behalf by a third party.

c) **Right to nominate:** You have the right to nominate any individual who may exercise your rights in the event of death or incapacity (inability to exercise the rights due to unsoundness of mind or infirmity of body).

d) **Right to withdraw consent:** If we process your personal data based on your consent, you can withdraw that consent at any time.

e) **Right to grievance redressal:** You can raise grievance with us if you believe we have not met our obligations under the DPDPA or if you are not able to exercise your rights.

f) **Right to approach the Data Protection Board of India:** Where you have raised a grievance with us and it has not been resolved within the timelines prescribed under applicable law, you may have the right to escalate the matter to the Data Protection Board of India, in accordance with the Digital Personal Data Protection Act and applicable rules.

Details on how to exercise these rights, including contact details for the Data Protection Officer and Grievance Officer, are provided in the Lloyds Technology Centre Website Privacy Notice available at <https://lloydstechnologycentre.com/privacy-policy>

10. Security practices

GSL implements appropriate managerial, technical, operational and physical controls, consistent with applicable data protection laws and Group standards, to safeguard personal data against unauthorized or unlawful access, loss, misuse, alteration or disclosure.

11. Updates to this notice

This Privacy Notice may be updated from time to time to reflect changes in law, regulation, or business practices. The latest version will always be made available through appropriate channels.