

## EMPLOYEE DATA PRIVACY POLICY

### 1.0 Objectives :

PTC, at all its locations nationwide is committed to protecting its employees' personal data and related privacy; and, complying with applicable data protection laws in India, whilst processing personal data of its current, prospective and former employees (hereinafter referred to as "you" or "employees"). This Privacy Policy (hereinafter referred to as "this Policy") explains how PTC will deal with all aspects related to processing of an employee's personal data in its business and commercial activities.

### 2.0 Applicability :

This Policy applies only to employees' personal data, and, to the management of such personal data in any form - whether oral or written, physical or electronic. Throughout this Policy, reference to "personal data" means and includes only data that personally identifies an individual employee or that may be used to personally identify an individual employee (as a natural person).

With respect to an individual employee, personal data illustratively includes :

- a. name, gender, date of birth, photograph;
- b. nationality;
- c. salary information, terms of employment, job/educational qualifications;
- d. social security or other taxpayer identification number, banking details;
- e. pensions, insurance and other benefits information (including name, gender, age and nationality of any spouse and other eligible beneficiaries);
- f. emergency contact, address, phone number, e-mail address, user ID and password.

Due processes specified under the Privacy Act applicable to employees will be followed whilst seeking the above data.

In addition to the above, if required for business needs, PTC may seek additional personal data, after following due process specified under the Privacy Act applicable to the employees.

### 3.0 Data Protection Principles:

The company needs to keep certain information about its employees, customers and suppliers for financial and commercial reasons and to enable us to monitor performance, to ensure legal compliance and for health and safety purposes. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

These principles require that personal data must be:

- a. obtained fairly and lawfully and shall not be processed unless certain conditions are met;

- b. obtained for specified and lawful purposes and not further processed in a manner incompatible with that purpose;
- c. adequate, relevant and not excessive;
- d. accurate and up to date;
- e. kept for no longer than necessary;
- f. processed in accordance with data subjects' rights;
- g. protected by appropriate security;
- h. not transferred to a country outside the European Union without adequate protection.

In processing or using any personal information you must ensure that you follow these principles at all times.

#### **4.0 Processing Purposes :**

Personal data of an employee may be processed by PTC on a nationwide basis for the following purposes :

- i. Personnel management and administration;
- j. Payroll management and other reimbursable expenses;
- k. Corporate travel;
- l. Development and training;
- m. Insurance programmes;
- n. Performance Management Systems;
- o. Implementation and monitoring of PTC policies as well as grievance and disciplinary processes;
- p. Accounting;
- q. Planning of work;
- r. Access control to PTC's premises;
- s. Protection of PTC, its affiliates and their personnel, clients and/or property in the context of imminent or pending legal proceedings and investigations;
- t. Areas similar to (a) to (k) above, which may be required by PTC, in the course of its usual day-to-day business and commercial activities.

Processing activities will be implemented after fulfilling additional requirements, if any, under the relevant Privacy Act applicable to employees.

In the scope of processing of employee personal data, related to the above activities, such personal data may require to be communicated to third party processors/service providers of PTC, which process data on behalf of PTC for the abovementioned purposes.

In such case, PTC will make its best efforts to cause such third party processors/service providers to abide by reasonable confidentiality obligations for processing such personal data.

#### **5.0 Transfer of Personal Information to Third Parties :**

PTC may not carry out the entirety of the data processing activities by itself; and, could also be assisted by third party processors/service providers which also process employees' personal data collected by PTC. As a policy, PTC discloses employees' personal data only to those who reasonably need to know such data for a legitimate business or commercial purpose related to PTC's operations. In such cases, PTC will make its best efforts that such third party processors/service providers abide by reasonable confidentiality obligations.

In addition, PTC may transfer personal data to third parties, for the following purposes :

- a. PTC Affiliates : for purposes of Human Resources management and other business areas related to PTC's operations, across all PTC entities nationwide;
- b. Competent Authorities : in the context of imminent or pending legal proceedings;

## **6.0 Cross Border Transfers :**

By your employment with any of PTC's entities nationwide, all employees of PTC nationally, acknowledge and accept, that, as a result of processing activities related to personal data as described above by PTC and/or any of its third party processors/service providers, your personal data may be transferred to outside jurisdictions. Upon request, PTC will provide you with a list of such countries.

## **7.0 Rights of Employees :**

Upon written request, and, to the extent that such request does not compromise the general protection set forth in this Privacy Policy, PTC allows employees access to their personal data, to access, amend or delete such data, free of cost. Employees have the legal right to request for deletion of data which is not processed in accordance with the applicable Privacy Act. Employees should communicate any such request to their local Human Resources Manager. If any employee is unable to access, amend or delete their personal data through their local Human Resources Manager, they may send a request to the Company Secretary.

Requests should be made by means of the Data Request Form. All employees are encouraged to use this facility, for any queries related to their personal data. PTC will endeavor to respond in a timely manner to all written requests to access, amend or delete personal data requested by an employee.

## **8.0 Individual Responsibilities :**

As an employee you are responsible for:

- a. checking that any information that you provide in connection with your employment is accurate and up to date;
- b. notifying the company of any changes to information you have provided, for example changes of address;

- c. ensuring that you are familiar with and follow the data protection policy.

Any breach of the data protection policy, either deliberate or through negligence, may lead to disciplinary action being taken and could in some cases result in a criminal prosecution.

## 9.0 **Data security :**

You are responsible for ensuring that:

- a. any personal data that you hold, whether in electronic or paper format, is kept securely;
- b. personal information is not disclosed either verbally or in writing, accidentally or otherwise, to any unauthorized third party;
- c. items that are marked 'personal' or 'private and confidential', or appear to be of a personal nature, are opened by the addressee only.

You should not use your office address for matters that are not work related.