



Celebrating 20 Years

# Privacy Notice

Third-Party Service Providers



A Larsen & Toubro  
Group Company

## Record of Release

Version No.	Modified By	Reviewed By	Authorized By	Release Date	Modifications Done
1.0	Pranav Parab Sherlyn Stanley	Vikram Patil	Sanjay Kothary Ajay Tripathi	12-Feb-2020	Document released with requirements of applicable privacy laws at this point in time
1.1	Pranav Parab Sherlyn Stanley	Vikram Patil	Sanjay Kothary Ajay Tripathi	09-June-2020	Updated document with respect to Personal Data Breach Mgmt. Policy and Procedure, Personal Data Retention Guideline, Applicability section

L&T Infotech Limited (hereinafter referred to as “LTI”, (“we”, “our”, “us”) is committed to protect the privacy and security of your personal data. It is important that you read this Privacy Notice (“Notice”) so that you are aware of how and why we are using such personal data.

### **1. Purpose:**

This Notice describes how we process your personal data, that you share with us during and after your working relationship with us.

### **2. Applicability:**

This Notice applies to all third-party service providers including but not limited to trainers, company SPOC, vendors, suppliers, contractors, office help, etc. This Notice does not form a part of any contract to provide services. We may update this Notice at any time, subsequent to which you will be made aware of the change.

This privacy notice uses GDPR as a baseline and privacy laws applicable for LTI offices.

### **3. Relationship:**

We are the "Data Controller" of your personal data. This means that we are responsible for deciding how we hold, use and process your personal data. We need to keep and process data about you for acceptable administrative purposes including hiring, for entering into a service contract with you, for complying with legal obligations and for record keeping purposes including contacting you for suitable opportunities that may arise in future. Processing will include collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, and use, disclosure by transmission, erasure or destruction of your personal data. The data we hold and process will be used for management, operational and administrative purposes only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, whilst you would be working for us, at the time when your service ends and after you have left us. This includes using data to enable us to comply with the service contract that we would be executing with you in case of your selection and any legal and customary requirements, pursue our legitimate interests, protect our workforce and stakeholders against injury, theft, legal liability, fraud, abuse and protect our legal position in the event of legal proceedings and compliance including compliance with government authority requests for information, liens and management compliances. If you do not provide this data or request for the deletion of data shared, we may be unable to, in some circumstances, comply with it due to legal obligations. We will tell you about the implications of such decision.

### **4. What Personal Data Do We Collect?**

We collect and process the following categories of personal data about you:

- Personal details including but not limited to First name/ Last name, current address, post code, telephone numbers, mobile number, corporate email addresses, signatures etc;

- Financial information including bank account holder’s name, bank account number, bank name and address, bank sort code, etc;
- CCTV footage of 3<sup>rd</sup> party (vendors, suppliers, service providers) staff in the LTI reception and work areas wherever cameras are located for security reasons, for the protection of our property and for health and safety reasons

Currently, we do not process sensitive data.

However, if we process any sensitive or the special categories of personal data revealing, including but not limited to the following in the future, we will inform you about the processing:

- 1) racial or ethnic origin,
- 2) political opinions,
- 3) religious or philosophical beliefs,
- 4) trade union membership,
- 5) the processing of genetic data,
- 6) biometric data for the purpose of uniquely identifying a natural person,
- 7) data concerning health,
- 8) data concerning a natural person’s sex life or sexual orientation,
- 9) financial data,
- 10) official identifiers,
- 11) transgender / intersex status,
- 12) caste / tribe,
- 13) social security measures
- 14) social status

If you are a California resident, the following applies to you:

In the past 12 months, we have or may have collected the following information about you. Please note that the following list represents categories of personal data across all California residents whose personal data we may have collected or received and does not necessarily represent information we have collected specifically about you:

Category	Examples
1. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.

Category	Examples
2. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
3. Protected classification characteristics under California or federal law.	Age (40 years or older), race, colour, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
4. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
5. Biometric information.	Genetic, physiological, behavioural, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
6. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
7. Geolocation data.	Physical location or movements.
8. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.
9. Professional or employment-related information.	Current or past job history or performance evaluations.
10. Non-public education information (as per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.
11. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, and aptitudes.

Please also note that the definition of “personal information” under CCPA is subject to certain exceptions as set forth therein and does not include information that is publicly available or has been aggregated or deidentified in accordance with CCPA.

We may have collected and processed personal data for various business purposes in the preceding 12 months, including:

- Auditing related to interactions with consumers in connection with the professional services LTI provides.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and taking appropriate action as a result of any such detected activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient uses where the personal data is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer’s experience outside the relevant interaction.
- Performing professional services for our clients.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.

## 5. Sale of Personal Data:

If you are a California resident, the following applies to you:

We do not sell your personal data for monetary consideration. However, we may allow certain third parties (such as online advertising services) to collect your browsing activity and certain other personal data via automated technologies on our website in exchange for non-monetary consideration. We may share the categories of personal data listed below in order to improve the performance of our website, to enhance your browsing experience, to provide you a more personalized browsing experience, and to improve our advertising efforts. You can view a full listing of those third-party cookies and opt-out of their use through the ‘How do I turn off cookies?’ section in our [cookie policy](#).

In the preceding 12 months we may have sold the following categories of personal data in connection with such third-party cookies:

- Identifiers. This includes Intinfotech.com visitors’ internet protocol (“IP”) addresses.
- Internet or network activity. This includes information about visitors’ interaction with Intinfotech.com, including information about the visitor’s web browser, page location,

referrer, and person using the website; cookie-specific data such as cookie ID and the cookie; and button and field data, such as any buttons clicked by site visitors, the labels of those buttons, any pages visited as a result of the button clicks, and the names of any website fields filled in by visitors.

## 6. How is Your Personal Data Collected?

We collect personal data about third party service providers through application, forms that are required to be filled at the time of third-party/vendor on-boarding either directly from the service provider or sometimes indirectly from third party service including background check provider/agency, credit reference agencies, etc. We may collect additional personal data in the course of the period you would be working for us. All data including any additional data collected during the on-boarding process will be used and stored for performance of hiring activity and the service agreement, as well as for complying with our legal obligations or legitimate interests.

## 7. How We Will Use Personal Data About You?

The purpose for processing personal data about our third-party service providers (including subcontractors, and individuals associated with our suppliers and contractors) is to manage our relationship and contract, and to receive services from our suppliers.

**We will only use your personal data when the law allows us to.**

**Most commonly, we will use your personal data in the following circumstances:**

- Where we need to perform a contract that we will be entering with you
- Where we need to comply with a legal obligation
- Where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests
- Where we have taken your explicit consent to process the data
- Where we need to protect your interests (or someone else's interests)
- where it is needed in the public interest (or for official purposes)

## 8. If You Fail to Provide Personal Data:

If you choose not to provide your personal data that is mandatory to process your request or for carrying out processing required as per our legitimate interests or any other purpose, we may not be able to provide the corresponding service.

## 9. Change of Purpose:

We will only use your personal data for the purposes for which we collected it. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so without undue delay. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 10. Data Sharing:

We may share your personal data with the following recipients:

- Third-parties with whom we have a contractual relationship, including clients, vendors etc. We require third parties to respect the security of your data and to treat it in accordance with our instructions and as per the law.
- Our other entities for performance of contract. We may transfer your personal data transnationally if required for the purpose of processing, wherever there is a requirement in accordance with the agreements executed amongst LTI offices and its clients.
- Internal departments, such as admin, procurement etc.

LTI will never share, sell or rent any of your personal information to any third party without notifying you and/or obtaining your consent. Where you have given your consent for us to share your information but later change your mind, you can contact us at [DPO@Lntinfotech.com](mailto:DPO@Lntinfotech.com) and we will stop doing so.

## 11. Transnational Data Transfer:

LTI may transfer the personal data transnationally depending upon the requirements for the performance of the contract with the third-party service provider or required for other related activities.

Further, to ensure that the third-party service provider's personal data receives an adequate level of protection we have executed Standard Contractual Clauses with our LTI Head office in Powai, India to ensure that personal data is treated in a way that is consistent with and which respects the applicable privacy laws on data protection, including but not limited to the third parties.

## 12. Data Protection:

LTI has put in place measures for the protection of your personal data. LTI has internal policies, procedures and controls in place to try and prevent your personal information from being



accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities.

Where your personal information is shared with third-party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions.

LTI also has Personal Data Breach Management Policy and Procedure in place to deal with a suspected data security breach and we will notify the applicable supervisory authority or regulator & you (data subject) of a suspected breach where we are legally required to do so.

### **13. Data Retention:**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such data without further Notice to you. Once your data is no longer required, we will securely destroy your personal data in accordance with the Personal Data Retention Guideline.

### **14. Data Protection Officer:**

LTI has appointed a data protection officer (DPO) to oversee privacy compliance with this Notice. If you have any questions about this Notice or how we handle your personal data, please contact the DPO at [DPO@Lntinfotech.com](mailto:DPO@Lntinfotech.com)

### **15. Your Duty to Inform us of Changes:**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

### **16. Rights Available to You:**

Under certain circumstances, by law, you have the:

- **Right to be Informed** is about providing you with clear and concise information about what we do with your personal data.
- **Right of Access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you as well as other supplementary information. It helps you to understand how and why we are using your data, and check we are doing it lawfully.
- **Right to Rectification** of the personal data that we hold about you. This enables you to have any inaccurate personal data we hold about you rectified. You may also able to have any incomplete personal data we hold about you completed.
- **Right to Erasure (Right to be Forgotten)** will enable you to ask us to delete or remove personal data which we process about you subject to limited circumstances in accordance with the privacy laws requirements.
- **Right to Object** to processing of your personal data effectively allows you to stop or prevent us from processing your personal data. Right to Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Right to Restrict Processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you. You have the right to restrict the processing of your personal data where you have a reason for wanting the restriction, example you may have issues with the content of the information we hold or how we have processed your data.
- **Right to Data Portability** of your personal data. This enables you to have the right to receive the personal data concerning you, which you have provided to us in a structured, commonly used, and machine-readable format. It also gives you the right to request us to transmit this data directly to another controller in a safe and secure way, without affecting its usability.
- **Right Related to Automated Decision-Making Including Profiling.** LTI does not carry out any automated decision making currently. However, if in the future we do so, you will have a right not to be subjected to a decision based solely on automated processing, including profiling. Such decisions can be made only if they are necessary for the entry into or performance of a contract or authorized by the Union or Member State law applicable to us or based on your explicit consent.
- ❖ **Withdrawal of Consent (or opt-out)** for processing of personal data where explicit consent if any has been sought. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you are a California resident, you have the following rights under certain circumstances:

- **Right of access and data portability.** You may have the right to request that we disclose to you information about our collection and use of your personal data in the preceding 12 months, including: (a) the categories and specific pieces of personal data we collect; (b) the categories of sources from which we collect or sell personal data; (c) the business or commercial purpose for which we collect personal data; (d) the categories of third parties with whom we share personal data; and (e) the categories of personal data disclosed for a business purpose or sold to third parties and the categories of third parties to whom such personal data was sold or disclosed.
- **Right to deletion.** You may request that we delete certain personal data that we have collected about you. The foregoing is subject to our right to maintain your personal data for specific purposes permitted under CCPA. If we are unable to comply with any such request, we will notify you.
- **Right to opt-out.** You may have the right to request that your personal data not be sold to third parties.
- **Right to non-discrimination.** You have the right to exercise any of the rights listed above (and any other rights under CCPA) without discrimination by us.

As part of processing your request, we require you to provide certain personal data about you in order to verify your identity in accordance with the CCPA requirements. This information includes your first and last name, email address, physical address, telephone number, and description of relationship to LTI, but may also include additional information based on the nature of your request and your relationship with us.

Additionally, in accordance with your rights under the CCPA, you may designate an authorized agent to make a request on your behalf. In order to comply with your request, we will require the personal data referenced above to be used for identity verification purposes, as well as the name, email address, and telephone number of your authorized agent.

Please note that you may only make an access request to us for your personal data up to two times in any 12-month period.

## 17. Exercising my rights / registering complaints or grievances

You may use any of the following methods to exercise your rights or register any grievance / complaint related to our processing of your personal data or related to our processing in accordance to applicable data protection principles, our policies and procedures:

- Send an email to [DPO@Lntinfotech.com](mailto:DPO@Lntinfotech.com)
- Additionally, for California residents, visit the link [LTI California Privacy Policy](#) for our contact details and the webform for submitting your requests.

- Exercise your right to opt-out of sale via the ‘Do not sell my personal information’ link on our website or directly by opting-out of third-party cookies through the ‘How do I turn off cookies?’ section in our [cookie policy](#).

**18. No Fee Usually Required:**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

**19. Changes to this Notice:**

We reserve the right to update this notice at any time, and we will provide you with a new Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

**If you have any questions about this Notice, please contact Data Protection Officer of LTI at [DPO@Lntinfotech.com](mailto:DPO@Lntinfotech.com) You may also refer to our [LTI Privacy Policy](#) and [LTI California Privacy Policy](#) published on the website for further information on LTI’s commitment towards privacy.**