

Cross Country Infotech Pvt. Ltd.

HR Policy - India

Privacy Policy

No part of this documentation may be reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopying or recording, for any purpose without express written permission of the HR of Cross Country Infotech.

Table of Contents

1. INTRODUCTION.....	3
2. WHAT DATA DO WE COLLECT?	3
3. WHAT DO WE DO WITH YOUR DATA?	4
4. WHO DO WE DISCLOSE YOUR DATA TO?.....	4
5. HOW LONG WE RETAIN YOUR DATA?	5
6. OUR SECURITY MEASURES.....	5
7. GOVERNING LAWS AND DISPUTES	5
8. CHANGES TO THIS POLICY.....	5
9. CONTACT US.....	5
10. CIRCUMSTANCE AND EXCEPTION SPECIAL	5

1. INTRODUCTION

We, Cross Country Infotech Pvt. Ltd. (“**Company**”, “**we**”, “**us**”, “**our**”) present this **Privacy Policy** to set forth *how we collect, use and protect the personal information* shared by you to seek employment at the Company

The applications may also be received through our website www.crosscountry.in (“**Website**”)

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY CLICKING “I AGREE” OR BY CONTINUING TO USE THE WEBSITE, OR PROVIDING US PERSONAL INFORMATION, YOU CONSENT TO OUR USE OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, YOU MAY WITHDRAW YOUR CONSENT OR ALTERNATIVELY CHOOSE NOT TO PROVIDE YOUR PERSONAL INFORMATION ON THE WEBSITE. SUCH AN INTIMATION TO WITHDRAW YOUR CONSENT CAN BE PROVIDED BY EMAIL TO CCIHR@crosscountry.com.

IF YOU ARE ACCESSING THE WEBSITE ON BEHALF OF A THIRD PARTY, YOU REPRESENT THAT YOU HAVE THE AUTHORITY TO BIND SUCH THIRD-PARTY TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND, IN SUCH AN EVENT YOUR USE OF THE WEBSITE SHALL REFER TO USE BY SUCH THIRD PARTY. IF YOU DO NOT HAVE SUCH AN AUTHORITY (TO PROVIDE ANY PERSONAL INFORMATION OF A THIRD PARTY) OR DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, THEN YOU SHOULD REFRAIN FROM USING THE WEBSITE.

2. WHAT DATA DO WE COLLECT?

Based on the nature of the position and how far in the recruiting process you may advance, we may collect (with your consent, where required by applicable laws) the following information. Except where otherwise stated, the provision of this information is mandatory if you wish to proceed with the recruitment process:

- (i) **Identifying Information:** Information that identifies a natural person including but not limited to
 - name, photograph, contact information (home address, phone number, email address) “**Personal Information**”;
 - a résumé or CV (which includes your employment history; previous salary details, qualifications, skills educational history, knowledge, licenses, certifications);
 - information about previous salary;
 - references and notes, interview notes (and any information you provide to us during an interview); and
 - where applicable to your role and permitted by law, background check results.
- (ii) **Video/Audio Recording:** If we conduct your interview by video, we may collect video images from those interviews, but we do not record or store interview footage (unless specifically requested).

- (iii) **Health Information:** The voluntary provision of information about any medical condition or disability in some circumstances, to allow us to consider whether we need to provide appropriate adjustments during the recruitment process or in respect of your employment (if successful).
- (iv) **Citizenship/Information to Demonstrate Ability to Work:** If you are successful in the recruiting process, we will request or collect additional information from you for the purpose of your employment (including evidence of identity as required to establish your right to work for immigration purposes, whether sponsorship is required) and we will share your information with additional service providers (e.g. to enable us to process payroll and use HR information systems).
- (v) **Testing:** Where permitted by applicable law and where relevant to your role, once you receive an offer, we may also ask you to submit to a drug test. Depending on your position, we will receive a pass/fail score or the results of that test.

Accuracy of information. Please make sure that any Personal Information you share with us is accurate and up to date information. If you are sharing any Personal Information on behalf of a third person, you should ensure that you are authorized to do so.

3. WHAT DO WE DO WITH YOUR DATA?

We use the Personal Information for the following purposes:

- (i) **Recruiting and hiring:** We collect Personal Information through the application process to enable us to conduct the recruitment process.
- (ii) **Respond to your inquiries:** To respond to your inquiries, complaints, questions and suggestions regarding the recruitment process.

4. WHO DO WE DISCLOSE YOUR DATA TO?

We transfer your Personal Information internally within Company group to recruitment teams, human resources teams, and hiring managers. We may disclose your Personal Information to third-parties in the following cases:

- (i) **Service Providers:** We may share your Personal Information with the service providers who work with us in connection with the recruitment process. All such service providers are subject to stringent confidentiality restrictions consistent with this Privacy Policy.
- (ii) **Merger or Acquisition:** We may transfer your Personal Information if we are acquired by another entity, or if we merge with another company or transfer a part of our business, including the Website, to a third party. Any such third party or resultant entity that receives your Personal Information shall have the right to continue to use your Personal Information in line with the purposes set out herein. In the event of such a sale or transfer, we may notify you.
- (iii) **Government, Legal and Regulatory Authorities:** We may disclose your Personal Information (a) in order to comply with our legal obligations/ court orders/ requests by Govt. authorities, (b) to

avail benefits of various schemes by the Government and (c) to enable us to pursue the available remedies or limit the damages that we may sustain.

5. HOW LONG WE RETAIN YOUR DATA?

We endeavour to only collect such Personal Information that is necessary for the purposes of the recruitment process. Personal Information belonging to applicants that are not employed by us will be retained for as long as necessary for our recruitment processes and records for re-applications.

6. OUR SECURITY MEASURES

Your Personal Information is stored on our third-party cloud storages. Although we provide appropriate firewalls and protections, we cannot warrant the security of Personal Information transmitted as these systems are not hack proof. Data pilferage due to unauthorized hacking, virus attacks, technical issues is possible, and we will take necessary measures to mitigate such events. You are required to be careful to avoid “phishing” scams, where someone may send you an e-mail that looks like it is from us asking for your personal information.

7. GOVERNING LAWS AND DISPUTES

This Privacy Policy shall be construed and governed by and interpreted in accordance with the laws of India, and the courts in Pune, India shall have an exclusive jurisdiction to adjudicate any subject matter under this Privacy Policy.

8. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time and you are encouraged to check this Privacy Policy on a regular basis to be aware of the changes made to it.

9. CONTACT US

If you have any questions or concerns or grievances regarding this Privacy Policy, you can reach out to our appointed grievance redressal officer via email at CCIHR@crosscountry.com.

10. CIRCUMSTANCE AND EXCEPTION SPECIAL

This policy may be revised or revoked or any change or alteration in policy by Cross Country Infotech Pvt. Ltd. at any time and will be informed to employees on timely basis by HR. Management has reserved all rights for any exception or deviation in the policy. Any deviation in the above policy will require written approval of the head of human resources – India.