PRIVACY & DATA PROTECTION POLICY

Normec Verifavia (*India*)

1. Introduction

At Normec Verifavia (India) ("Normec Verifavia", "us", "we"), we respect the privacy of every individual and visitor and are committed to take reasonable precautions to protect information consisting of Personal Information and 'Digital Personal Data Protection Rules, 2025' (DPDP) and to comply with all legal, regulatory and/or contractual obligations related to privacy. Normec Verifavia has adopted the "Privacy by Default" principles in its approach to data privacy i.e. privacy of data and information is upheld first by default.

This policy covers the processing, storage and access to Information as required under lawful and/or contractual activities with Normec Verifavia or otherwise required in the normal course of business. It describes Normec Verifavia's policies and procedures on the collection, usage and disclosure of Information provided/received by natural persons and meets the requirements of applicable data protection laws of the jurisdictions in which we operate and the rules made thereunder.

2. Scope

Normec Verifavia is committed to processing your personal data as per the laws of your jurisdiction. We hereby notify you of the following information about your personal data processing.

3. Personal Data Elements Collected / Processed

We collect your personal data such as first, middle and last name, email address, contact details and other Information that you provide while interacting with us through the course of our business engagements.

Categories of Personal Information (including sensitive personal information, any information that is freely available or accessible in the public domain, furnished under the Right to Information Act, 2005, or available on open platforms, public registers or official records, shall not be regarded as sensitive personal information) that we process for recruitment and employment-related activities include candidate name, contact details, resume, date of birth, educational qualification including skill details, employment-related information, details pertaining to background checks, passport details (only if shortlisted). A few other details are collected and financial details and national identification details.

Please note that the categories of personal (or sensitive personal) details processed may differ based on the business requirement of the entity and legal requirement.

4. Purpose of Collection

We process your personal data for the following purposes based on Legitimate use: Employment purpose and engagement with our services:

- To assess a candidate's suitability towards job requirements as part of the recruitment or internship selection process and other associated processes including background verification by our authorized vendor.

- To carry out various employer-related activities if you are selected to join the organization and to enable us to ensure that we are compliant with any applicable labour and/or other relevant laws.

5. Legal Basis of Processing

We process your Personal Information when it is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract, or based on your consent, as per applicable laws.

6. Data Recipients / Accessible to

Your Personal Data will be accessible to certain authorized data recipients for the above processing of personal data, which may include internal recipients within Normec Verifavia, its subsidiaries, parent or affiliates such as Recruitment, Human Resources, Finance, Facilities, Business Units, Org Leadership; our authorized service providers, who may require access to the same for processing in relation to the above-stated purpose(s); Normec Verifavia's Clients (where applicable) based on contractual obligations; statutory and regulatory authorities and law-enforcement agencies (where applicable); and any other parties expressly or impliedly authorized by you for receiving such disclosures.

7. Disclosure of Information

Normec Verifavia shall not use or disclose Information for purposes other than as mentioned in this policy, except with the consent of the visitor/candidate providing such Information or as required by law. However, Normec Verifavia may be legally required to disclose the Information in the following cases:

- Where the disclosure is necessary for compliance of a legal obligation;
- Where mandated under the law by government agencies to disclose such Information.

Where necessary, Normec Verifavia may disclose Information to business partners or third parties during the normal course of business for the purposes mentioned in this policy. In such cases, Normec Verifavia will only share Information-related data when Normec Verifavia is assured that:

- The Information is processed legitimately and appropriately by the business partner or third party in line with the established consent or in line with legal requirements.
- The business partner or third party has adopted a reasonable and equivalent level of security practices and procedures to ensure security of the Information shared.

8. International Data Transfers

- Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- If necessary for the purposes stated above, the Personal Data may be transferred to our offices located globally, and to our vendors / service providers, in India and across the globe. We shall take the necessary steps to ensure confidentiality and security of the transferred data.
- You expressly agree to the transfers of personal information described in this Section.

9. Data Storage

Your Personal Data will reside on systems operated by Normec Verifavia and on the servers of our authorised service providers, including Microsoft Corporation (Microsoft 365 / SharePoint Online) and other cloud service providers. Depending on the configuration of the Normec Group tenant, such servers may be located in India, the European Union, or other jurisdictions in which the Normec Group or its service providers operate. Where Personal Data is stored or processed outside India, the transfer is carried out in accordance with Section 8 (International Data Transfers) of this Notice and applicable data protection law and the rules made thereunder.

10. Secondary Purpose

If we wish to use your personal data for a new purpose not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing, unless authorized by law.

11. Data Security

Normec Verifavia adopts reasonable and appropriate security practices and procedures including administrative, physical security, and technical controls in order to safeguard your Personal Data.

12. Data Retention

Personal Data that is no longer required to be retained as per legal and business requirements will be deleted/disposed of in a secure manner.

13. Data Modification

You have the right to request that we correct, complete or update inaccurate or incomplete Personal Data that we hold about you. On receipt of a verifiable request, we will use reasonable efforts to correct or update the relevant information within the timelines prescribed under applicable data protection law, and the rules made thereunder. Requests may be submitted to hr.verifavia@normecgroup.com.

14. Data Deletion

You have the right to request that we erase your Personal Data, subject to exceptions recognised under applicable law. On receipt of a verifiable request, we will assess the request against these exceptions and respond within the timelines prescribed under applicable data protection law. Requests may be submitted to hr.verifavia@normecgroup.com.

15. Data Subject Rights

You have the right to confirm whether Normec Verifavia is processing your Personal Data and, if so, to access a summary of the data, the processing activities, and the recipients with whom it

has been shared. Requests may be submitted to hr.verifavia@normecgroup.com and will be addressed within the timelines prescribed under applicable data protection law.

16. Updates to this Privacy Notice

Normec Verifavia may change its data privacy practices and update this Privacy Notice as and when the need arises. Our commitment to protect your privacy will continue to remain.

17. Contact

For feedback or concern, if any, kindly contact:

Email: hr.verifavia@normecgroup.com

18. Disclaimer

This Privacy Notice may be made available to you through our website, by email, or through a portal or application operated by Normec Verifavia or the Normec Group. By clicking on the acceptance, "I Agree" or equivalent button (where presented), by signing or returning this Notice, by submitting your Personal Data through any of the above channels, or by continuing to engage with us in connection with the purposes described above, you confirm that you have read and understood this Privacy Notice and that Normec Verifavia may hold and process your Personal Data for the purposes described herein.