

# PRIVACY NOTICE FOR JOB APPLICANTS

WNS is committed to protect the privacy and security of your personal data that we process. It is important that you read this Privacy Notice (“Notice”) so that you are aware of how and why we are using your personal data.

## 1. Purpose

This Notice describes how we collect and use personal data about you, during and after your working relationship with us, in accordance with **The Digital Personal Data Protection Act (DPDPA)**.

## 2. Applicability

This Notice applies to all job applicants applying for jobs at WNS India. This Notice does not form part of any contract of employment or other contract to provide services. We may update this Notice at any time, subsequent to which, a copy of the updated Notice will be furnished to every job applicant at the earliest.

## 3. Relationship and Purpose of Processing Data

WNS is responsible for deciding how we hold, use and process your personal data. As your prospective employer, we need to keep and process data about you for normal employment purposes including hiring, recruitment and staffing purposes, for entering into a 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 employment ends and after you have left us. This includes using data to enable us to comply with the employment 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, garnishments and tax compliances. If you do not provide this data or request for the deletion of data, we may be unable in some circumstances to comply with our legal obligations and we will tell you about the implications of that decision.

## 4. WNS may process the following categories of personal data about you:

- Personal details including name, title, addresses, post code, telephone numbers, mobile number, personal email addresses, IP Address, geo location, date of birth, gender, age, utility bills, photographs, signatures etc.
- National ID details including passport number, driving license, tax identification numbers, national identification numbers, etc.
- Recruitment information including work experience, qualification details, copies of right to work documentation (work permit certificate), references and other information included in a CV or cover letter or as part of the application process, language test results, background check report, credit

check report previous employment references/feedbacks etc. wherever permissible by the local laws, etc.

- CCTV footage and other information obtained through electronic means such as swipe card records, etc.
- Medical information including health, blood group, disability details, any specific medical condition, health and sickness records/medical certificates.
- Criminal information including criminal convictions and offences

#### **5. How is your personal data collected**

WNS collects personal data about job applicants through application, forms and interviews as a part of the recruitment and on-boarding process, either directly from the job applicants or sometimes indirectly from third party service providers including employee referrals, an employment agency or background check provider/agency, former employers, credit reference agencies, medical clinics etc. We will collect additional personal data in the course of job-related activities throughout the period you would be working for us. All data including any additional data collected during the recruitment process will be used and stored for performance of recruitment activity and the employment agreement that we would be executing with you in case of your selection, as well as for complying with the legal obligations or legitimate interests of WNS.

#### **6. How will we use personal data about you/Our basis of processing**

WNS will only use your personal data when permitted under DPDPA. We will process your personal information either with your consent or under one of the following legitimate uses’:

- Where it is necessary for purposes of employment, including activities required to evaluate your application, administer your employment, or safeguard the organisation from loss or liability.
- Where required to comply with a legal obligation, including verifying eligibility to work.
- Where it is necessary to respond to a medical emergency, provide treatment during an epidemic or similar public-health threat, or ensure safety during a disaster or breakdown of public order.

#### **7. If you fail to provide personal data**

If you fail to provide certain data when requested, we may not be able to perform our recruitment process and the contract that we might have to execute with you based on your selection (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our employees).

#### **8. Change of purpose**

WNS 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 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.

## **9. Data sharing**

WNS may share your personal data with the following recipients:

Third parties with whom we have a contractual relationship, including medical vendor, law firm, data shredding, background check vendor, technology vendor 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.

## **10. Verifiable consent of Lawful Guardians for Candidates with Disabilities**

In accordance with the requirements of DPDPA and its accompanying rules, WNS is committed to ensuring that the personal data of individuals with disabilities is processed lawfully, fairly, and with appropriate safeguards.

Where an individual is a person with a disability, we are required to obtain verifiable consent from their lawful guardian before processing that individual's personal data. As per Rule 11 of the DPDPA Rules, the lawful guardian must be verified as having been appointed by a court of law, a designated authority, or a local level committee under the applicable laws governing guardianship.

WNS may request documentation necessary to verify the lawful guardian's appointment.

## **11. Transferring information outside India**

WNS may transfer your personal data to its group companies located outside India, provided such transfers are not restricted by the Central Government and are carried out in accordance with DPDPA. Any such transfer will occur only where the processing is based on your consent or is permitted under one of the legitimate uses specified in DPDPA, and subject to compliance with all applicable security and governance requirements.

## **12. Data Security**

WNS has put reasonable security safeguards in accordance with DPDPA. These safeguards include appropriate technical and organisational measures that are proportionate to the risks associated with the processing of your data.

Third parties will only process your personal data on our instructions and where they have agreed to treat the information with confidentiality measures that meet DPDPA requirements. We do enter into specific agreements with such third parties to ensure compliance.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **13. Data Retention**

WNS will only retain your personal information 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. Personal data of successful and

unsuccessful candidates will be retained and securely destroyed in accordance with our Data Retention Policy or applicable laws and regulations.

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

WNS has appointed a Data Protection Officer (DPO) to oversee compliance with this Notice. If you have any questions about this Notice or how we handle your personal data, please contact the DPO at [privacy@wns.com](mailto:privacy@wns.com). You have the right to make a complaint at any time to the regional supervisory authority regarding data protection issues.

#### **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**

Your rights in connection with personal data: Under certain circumstances, by law, you have the:

- Right to access your personal data. This enables you to receive a copy of the personal data we hold about you.
- Right to correct the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you.
- Right to erasure of your personal data. This enables you to request the deletion of personal data we hold about you when there is no valid reason for us to continue processing it.
- Right to grievance redressal enables you to raise concerns or complaints about the processing of your personal data with our DPO at [privacy@wns.com](mailto:privacy@wns.com), and if you are not satisfied with our response, you may escalate the matter to the Data Protection Board of India (DPBI) through its online complaint portal as outlined in the DPDPA.
- Right to nominate enables you to appoint another individual to exercise your data protection rights on your behalf in the event of your incapacity or death.

All the above-mentioned rights can be exercised by contacting the DPO at [privacy@wns.com](mailto:privacy@wns.com).

If you are not satisfied with our response, you have the right to submit a complaint directly to the Data Protection Board of India (DPBI), the authority responsible for monitoring and enforcing the Digital Personal Data Protection Act, 2023.

You can file a complaint with the DPBI through the official channels published by the Government of India. Information on the DPBI's dispute-redressal mechanisms will be available on its designated digital platform, as provided under the DPDP Act and DPDP Rules.

#### **17. No fee is 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.

If you have any questions about this Notice, please contact DPO at [privacy@wns.com](mailto:privacy@wns.com).