Introduction and Purpose

Indegene Limited ("Indegene", "we", "our", or "us") is a healthcare and life sciences commercialization company operating globally. We recruit professionals at various levels for permanent and temporary positions, including opportunities to work with Indegene and our clients across multiple jurisdictions.

This Recruitment Privacy Notice ("Notice") explains how Indegene collects, uses, stores, transfers, and protects Personal Data relating to candidates and prospective employees who apply for employment opportunities with Indegene or are considered for employment through other lawful recruitment channels.

In its capacity as a Data Controller, Indegene is committed to protecting Personal Data collected during recruitment and employment-related activities. Indegene employees, business associates, service providers, and other authorized parties who process such data are required to maintain its confidentiality and security and to comply with applicable data protection laws.

Indegene follows a global privacy framework supported by regional supplements, where required, to meet local legal obligations.

Scope of this Privacy Notice

This Notice applies to Personal Data collected from:

- Visitors to Indegene websites who submit resumes, applications, or express interest in employment opportunities.
- Prospective employees referred by Indegene employees, business associates, clients, recruitment agencies, or other lawful sources.
- Individuals participating in campus recruitment programs, recruitment events, assessments, or other recruitment initiatives conducted by Indegene.

This Notice explains:

- How Personal Data is collected and used.
- How Personal Data is secured, retained, and processed.
- How Personal Data may be shared and transferred internationally.
- The rights available to candidates under applicable privacy laws.

Consequences of Not Providing Personal Data

Providing certain Personal Data is necessary for Indegene to evaluate a candidate's suitability for employment and to comply with legal and contractual obligations.

If a candidate chooses not to provide Personal Data required for recruitment purposes, Indegene may be unable to assess the application, continue the recruitment process, or offer employment.

Personal Data We Collect

Depending on the role and stage of recruitment, Indegene may collect the following categories of Personal Data:

- Full name
- Contact information, including email address, telephone number, and postal address
- Educational qualifications and certifications
- Employment history and professional experience
- Professional references
- Compensation expectations
- Interview notes and assessment results
- Work authorization or immigration-related information where required
- Background verification information where permitted by applicable law

Sensitive Personal Data

In limited circumstances and where permitted by applicable law, Indegene may collect and process sensitive or special category Personal Data, including information relating to:

- Disability accommodations
- Diversity, equity, and inclusion initiatives
- Health-related information necessary for recruitment accommodations
- Criminal background checks where legally permitted

- Other sensitive information required to comply with legal obligations

Such information will only be processed where necessary and where a specific legal condition applies. Depending on the jurisdiction, this may include the candidate's explicit consent; the performance of obligations or exercise of rights in the field of employment and social security and social protection law; equal-opportunity, diversity or accessibility monitoring carried out under, and to the extent permitted by, applicable law; or the establishment, exercise or defence of legal claims. Criminal-record and background-check information will be processed only where authorised by law or carried out under the control of an official authority. Where the EU or UK General Data Protection Regulation applies, processing of special category data and criminal-conviction data is conducted in reliance on a condition under Articles 9 and 10 (and, in the United Kingdom, Schedule 1 to the Data Protection Act 2018), and equivalent conditions are applied in other jurisdictions.

Sources of Personal Data

Indegene may collect Personal Data from:

- Candidates directly
- Recruitment agencies and staffing providers
- Employee referrals
- Professional networking platforms and publicly available professional profiles
- Educational institutions, where authorized
- Background verification providers
- References provided by candidates
- Other lawful sources connected with recruitment activities

Legal Basis for Processing Personal Data

Indegene processes Personal Data for recruitment and employment-related purposes based on one or more of the following legal grounds, depending on the applicable jurisdiction:

- Legitimate interests in recruiting and evaluating suitable candidates
- Taking steps prior to entering into an employment contract

- Compliance with legal and regulatory obligations
- Candidate consent where required by applicable law
- Establishing, exercising, or defending legal claims

Personal Data is used to:

- Assess suitability for employment opportunities
- Conduct interviews and evaluations
- Verify qualifications, references, and employment history
- Determine employment eligibility
- Prepare employment offers and contracts
- Maintain recruitment records
- Comply with legal and regulatory obligations

Indegene may disclose Personal Data to governmental authorities, regulatory bodies, courts, or law enforcement agencies where required by applicable law.

Automated Decision-Making and Profiling

Indegene may use assessment tools, screening technologies, analytics, or profiling techniques to assist in evaluating candidate suitability for specific roles.

Where such tools are used, they support, but do not replace, human judgement. Indegene does not make decisions that produce legal effects concerning a candidate, or that similarly significantly affect a candidate, based solely on automated processing without meaningful human review. Where any solely automated decision-making with such effects is carried out, it will only occur where permitted by applicable law and with the safeguards required by law, including the right to obtain human intervention, to express the candidate's point of view, and to contest the decision.

Candidates may contact Indegene using the contact details provided below for further information regarding the use of such technologies.

Parties with Access to Personal Data

Personal Data may be accessed by authorized personnel involved in recruitment activities, including:

- Talent Acquisition teams
- Human Resources teams
- Compensation and Benefits teams
- Finance teams where required
- Compliance and Legal teams
- Hiring managers and interview panel members
- Other authorized personnel involved in recruitment administration

Access is limited to individuals who require the information for legitimate business purposes.

Sharing of Personal Data

Personal Data collected during recruitment may be shared with:

- Indegene group companies
- Clients where recruitment is conducted on behalf of or in connection with client engagements
- Background verification providers
- Assessment and psychometric testing providers
- Recruitment service providers
- Information technology and cloud service providers
- Professional advisers, auditors, and legal counsel
- Governmental and regulatory authorities where required by law

All third parties are required to protect Personal Data and process it only for authorized purposes.

International Transfers of Personal Data

For recruitment and employment-related purposes, Indegene may transfer Personal Data to its offices, affiliates, service providers, and authorized business partners located in:

- India
- United Kingdom
- European Union / European Economic Area
- United States
- Canada
- China
- Other jurisdictions in which Indegene operates

Some jurisdictions may not provide the same level of data protection as the country in which the data was originally collected.

Where required by applicable law, Indegene implements appropriate safeguards, including:

- Standard Contractual Clauses (SCCs)
- For transfers from the United Kingdom, the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU SCCs
- For transfers originating in China, a lawful transfer mechanism under the Personal Information Protection Law (PIPL) (such as the China standard contract or a government security assessment) and, where required, the candidate's separate consent
- Data transfer agreements
- Technical, and organizational safeguards

These measures are designed to protect Personal Data and preserve candidates' rights during international transfers.

Where local law requires a candidate's separate or explicit consent before Personal Data is transferred outside the country of collection (for example, under China's Personal Information Protection Law), Indegene will obtain that consent before making the transfer. A copy of the relevant safeguard may be requested using the contact details below.

Security of Personal Data

Indegene maintains appropriate administrative, technical, and organizational safeguards designed to protect Personal Data against unauthorized access, disclosure, alteration, loss, misuse, or destruction.

Such measures may include:

- Role-based access controls
- Secure storage systems
- Encryption where appropriate
- Monitoring and auditing mechanisms
- Confidentiality obligations for personnel
- Incident response and security management processes

While no system can guarantee absolute security, Indegene takes reasonable measures to safeguard Personal Data throughout its lifecycle.

In the event of a personal data breach, Indegene will notify affected candidates and the relevant supervisory authority or regulator where, and within the timeframes, required by applicable law.

Retention of Personal Data

Indegene retains Personal Data in accordance with its global privacy framework, applicable legal requirements, and legitimate business needs.

Personal Data is retained only for as long as necessary to:

- Evaluate candidates for current opportunities
- Consider candidates for future opportunities
- Maintain recruitment records
- Comply with legal and regulatory obligations
- Establish, exercise, or defend legal claims

Global Retention Principles

- Unsuccessful candidates and talent pool candidates may be retained for future opportunities where permitted by law and, where required, with the candidate's consent.
- Successful candidates' recruitment records become part of their employee records and are retained in accordance with applicable employee retention policies.

Region-Specific Retention Guidelines

- United Kingdom and Ireland: Up to 12 months (with consent where required)
- European Union: Up to 12 months (with consent where required)
- India: Up to 3 years (with consent where required)
- United States, Canada, and Other Regions: Up to 2 years (with consent where required)

Retention Criteria

Retention periods are determined based on:

- Legal and regulatory requirements
- Statutory limitation periods
- Sensitivity of Personal Data
- Business needs
- Candidate expectations
- Candidate consent, where applicable

End of Retention Period

At the end of the applicable retention period, Personal Data will be securely deleted, anonymized, or archived with restricted access where retention is legally required.

Candidates may request deletion of their Personal Data or withdraw consent by contacting cpo@indegene.com.

Candidate Privacy Rights

Subject to applicable law, candidates may have the right to:

- Access their Personal Data

- Correct inaccurate or incomplete Personal Data
- Request deletion of Personal Data
- Restrict processing of Personal Data
- Object to processing based on legitimate interests
- Request portability of Personal Data
- Withdraw consent where processing is based on consent
- Request information regarding automated decision-making
- Lodge a complaint with a competent supervisory authority or regulator
- Seek grievance redressal through Indegene's grievance mechanism in respect of the processing of their Personal Data
- Nominate another individual to exercise their rights in the event of death or incapacity, where provided by applicable law (such as the India Digital Personal Data Protection Act, 2023)

Requests may be submitted using the contact details provided below.

Contact Information

Global Privacy Contact

Mr. Karthik Kannappan
Data Privacy Officer

Indegene Limited
Manyata Embassy Business Park
Aspen Block G4, Outer Ring Road
Nagawara
Bengaluru, Karnataka 560045
India

Phone: +91 80 4674 4567
Email: cpo@indegene.com

California Privacy Notice

For California residents, this Notice is intended to supplement and comply with the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

California residents may have rights to:

- Know what Personal Information is collected and disclosed
- Request access to Personal Information
- Request correction of inaccurate Personal Information
- Request deletion of Personal Information
- Limit the use of sensitive Personal Information where applicable
- Exercise privacy rights without discrimination

Requests may be submitted using the contact information provided above.

Categories of Personal Information collected, the sources, the business or commercial purposes for collection, and the categories of recipients are described in the relevant sections of this Notice above. Indegene retains each category of Personal Information for the periods described in the "Retention of Personal Data" section, or for as long as reasonably necessary for the purposes described in this Notice.

Indegene does not "sell" and does not "share" (for cross-context behavioral advertising) the Personal Information of candidates, as those terms are defined under the CCPA/CPRA. California residents may use an authorized agent to submit a request, subject to verification of the agent's authority and of the resident's identity as permitted by law.

Changes to this Privacy Notice

Indegene may update this Notice from time to time to reflect changes in legal requirements, business practices, technologies, or recruitment processes.

Any updated version will be published through appropriate channels. Candidates are encouraged to review this Notice periodically.