

Walgreens India Private Limited Privacy Notice & Consent for Interns, Job Applicants, Contractors and Temporary Workers

Walgreens India Private Limited ("**Company**," "**we**," "**our**," or "**us**") is committed to protecting your privacy and handling your personal information responsibly.

This privacy notice ("**Privacy Notice**") explains how we collect, use, disclose, store, process and protect personal information and sensitive personal data or information ("**SPDI**") relating to contractors, temporary workers, interns, and job applicants in India, as applicable ("**you**" / "**your**").

Information We Collect

We collect the following categories of personal information:

Job Applicants/Candidates

- Name
- Gender
- Home and mailing address
- Telephone number
- Email address
- Date of birth
- Photographs
- Applicant identification number
- Educational and professional qualifications, resume/CV
- Employment history
- Emergency contact information
- Skills, competencies, interview assessments, aptitude test results
- Data generated through AI tools used in recruitment, such as AI-led interview recordings, transcripts, and assessment scores
- References and referral information
- Background verification reports
- CCTV footage and visitor logs when attending interviews at Company's premises

Contractors and Temporary Workers

- Name

Updated: 10 September 2026

- Gender
- Home and mailing address
- Telephone number
- Email address
- Date of birth
- Photographs
- Contractor/temporary worker identification number
- Educational and professional qualifications, resume/CV
- Employment/engagement history
- Emergency contact information
- Bank account details for payment processing
- Tax identification information (PAN, etc.)
- Contract/engagement details and terms
- Background verification reports; and
- CCTV footage and visitor logs when attending Company's premises

Interns

- Name
- Gender
- Home and mailing address
- Telephone number
- Email address
- Date of birth
- Photographs
- Intern identification number
- Educational institution and course details
- Educational qualifications and resume/CV
- Emergency contact information

Updated: 10 September 2026

- Bank account details for stipend processing (if applicable)
- Internship period and assignment details
- Background verification reports (if applicable); and
- CCTV footage and visitor logs when attending Company's premises

Sensitive Personal Data or Information (SPDI)

Where necessary and permitted by law, we may collect:

- Passwords and authentication credentials
- Financial information, including bank account details used for payroll, stipend administration, reimbursement, or payment processing
- Medical information, health conditions, disability accommodation information, and medical records provided in connection with employment or benefits
- Biometric information used for identity verification or physical access controls

Sources of Collection of Information

We collect your personal information from the following sources:

Job Applicants/Candidates

- From Company's career website, job portals, referrals, recruitment agencies, campus recruitment drives at colleges/universities, or job alert subscription forms
- Through interviews, assessments, aptitude tests, and other selection processes
- From background verification agencies and reference checks
- From career fairs, or other recruitment events
- From public sources, professional networking platforms, and other online resources
- From CCTV and security systems when visiting Company premises or offices for interviews or other recruitment-related activities
- From referrals, staffing agencies, vendor organisations, or direct applications
- Through ethics, compliance, whistleblower, and reporting hotline channels (including reports, inquiries, or concerns submitted through Company-designated reporting platforms and service providers) (where applicable)

Contractors and Temporary Workers

- Through interviews, assessments, and selection processes
- From background verification agencies and reference checks

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- From the contractor's or staffing agency's records
- From public sources, professional networking platforms, and other online resources
- From CCTV and security systems when visiting or working at Company premises
- Through ethics, compliance, whistleblower, and reporting hotline channels (including reports, inquiries, or concerns submitted through Company-designated reporting platforms and service providers) (where applicable)

Interns

- From campus recruitment drives in universities/colleges
- From referrals, Company's career website, or direct applications
- Through interviews, assessments, and selection processes
- From background verification agencies and reference checks (if applicable)
- From public sources, professional networking platforms, and other online resources
- From CCTV and security systems when visiting or working at Company premises
- Through ethics, compliance, whistleblower, and reporting hotline channels (including reports, inquiries, or concerns submitted through Company-designated reporting platforms and service providers) (where applicable)

Purpose of Collection of Information

We collect and process personal information for legitimate business purposes such as:

Job Applicants/Candidates

- Processing and evaluating job applications
- Conducting interviews, assessments, and selection processes
- Candidate screening, assessment, and evaluation, including through use of AI-enabled tools
- Verifying identity, credentials, qualifications, and employment history
- Conducting background verification and reference checks
- Communicating with candidates regarding job opportunities, applications, and recruitment status
- Administration of reporting programs and investigation of concerns, including allegations of misconduct, policy violations, ethics and compliance matters, fraud, retaliation, and security incidents (where applicable)
- Compliance with legal and regulatory requirements

Contractors and Temporary Workers

- Engagement, contract administration, and project assignment

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- Verifying identity, credentials, and qualifications
- Payment processing and compensation management
- Identity verification and access management
- Performance monitoring and quality assurance
- Conducting background verification and reference checks (where applicable)
- Administration of reporting programs and investigation of concerns, including allegations of misconduct, policy violations, ethics and compliance matters, fraud, retaliation, and security incidents (where applicable)
- Compliance with legal, regulatory, and contractual obligations

Interns

- Internship recruitment, selection, and onboarding
- Internship programme administration and management
- Verifying identity, credentials, and educational qualifications
- Stipend and allowance processing (if applicable)
- Identity verification and access management
- Performance evaluation and feedback
- Conducting background verification and reference checks (where applicable);
- Administration of reporting programs and investigation of concerns, including allegations of misconduct, policy violations, ethics and compliance matters, fraud, retaliation, and security incidents (where applicable)

We will collect only the information necessary for these purposes.

Use of AI Tools in Recruitment

As part of our recruitment and talent acquisition processes, we may use AI-enabled tools and technologies to assist with activities such as reviewing and assessing applications, evaluating candidate qualifications and suitability, scheduling or facilitating interviews, and other recruitment-related activities. Where AI tools are used, they will be subject to appropriate oversight and review by the Company and will be used in accordance with applicable laws and regulations. By submitting your application and/or participating in the recruitment process, you acknowledge and understand that AI tools may be used as part of the recruitment process. The use of AI tools will not, where applicable, replace meaningful human oversight in making recruitment decisions.

Disclosure of Information

For the purposes mentioned in the 'Purpose of Collection of Information', we will share your personal information with:

- Affiliates within our corporate group

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- Human resources, payroll, and benefits providers
- Technology and security service providers
- Professional advisors, auditors, and legal counsel
- Government authorities, regulators, law enforcement, or courts where required by law

We do not disclose personal information to third parties without consent unless permitted or required by applicable law.

Cross-Border Transfers

We may transfer your personal information to process your personal information in countries outside India, including the United States and other jurisdictions where the Company or its service providers operate. Such transfer or processing will take place in accordance with applicable legal requirements.

The Company will implement reasonable measures designed to ensure that transferred information receives an appropriate level of protection consistent with applicable legal requirements.

Information Security

The Company maintains reasonable security practices and procedures, in accordance with applicable data protection laws designed to protect personal information against unauthorized access, disclosure, alteration, loss, or misuse. These measures may include:

- Access controls
- Encryption where appropriate
- Authentication mechanisms
- Security monitoring
- Confidentiality obligations
- Vendor security requirements

Your Rights

Subject to applicable laws, you may:

- Review the SPDI provided by you
- Request correction, amendment or updation of SPDI provided by you
- Withdraw your consent for the processing of SPDI

Please note that withdrawal of consent may affect the Company's ability to administer employment, contractual engagements, or internships, or to provide certain services to you. Please also note that withdrawal of consent will not be retrospective in nature and shall be applicable prospectively.

Retention

The Company retains personal information for as long as reasonably necessary to fulfill the purposes described in this Privacy Notice or when you withdraw your consent to the processing of your personal information. We may continue to retain your personal information to comply with legal obligations, resolve disputes, and enforce contractual rights.

Grievance Officer / Contact Information

If you have questions, concerns, grievances, complaints regarding your personal information or should you wish to exercise any of your rights in relation to your personal information, please contact our Grievance Officer: privacy.office@walgreens.com.

Please ensure your request includes sufficient information to verify your identity (such as your registered phone number, registered email address, job application number as applicable). We may take reasonable steps to authenticate your identity before acting on your request. We may decline to process requests that are frivolous or risk the privacy or impact the rights of others.

The Company will endeavour to respond to requests relating to SPDI within 30 (thirty) days from receipt of your request. However, if additional time is required due to the nature of the request or query, the Company will keep you appropriately informed.

Updates to this Privacy Notice

From time to time, we may revise this Privacy Notice. Any such changes to this Privacy Notice will be reflected on this page. The Company recommends that you review this Privacy Notice regularly for any changes. The date on which this Privacy Notice was last revised is located above.