

**PRIVACY NOTICE**  
**regarding the processing of personal data of candidates**

[Version 1.0, valid from 12.1.2021]

This notice regarding the processing of personal data of candidates ("**Privacy Notice**") is addressed to candidates, covering aspects related to the processing of their personal data.

Your personal data is collected and processed by **MassMutual Global Business Services India L.L.P.**, a Company incorporated under the provisions of the Limitation Liability Partnership Act, 2008 having its registered office at 7<sup>th</sup> Floor, Block – 1, BSR IT SEZ, Nanakramguda Village, Serilingampally Mandal, Ranga Reddy District, Hyderabad with LLP Identification Number AAR-3848 ("**Company**"), as data controller.

**A. Personal data we process**

*Personal data:*

For the purpose of conducting the recruitment process and potential future conclusion of an individual employment contract or any other contract that produces similar effects, we will collect the following personal data from you:

- a. your name;
- b. your contact details (phone number, address, e-mail);
- c. data included in your resume (including education, professional experience, hobbies);
- d. criminal record data;
- e. data collected from professional networks (*i.e.* LinkedIn), *if the case*;
- f. other information you provide during interviews (*if the case*);

Furthermore, in the case that an interview or an evaluation is scheduled at our headquarters, you may be recorded by the Company's video surveillance system installed at entry and exit points within the building, common areas and network/server rooms.

You may also be seen in video recordings collected through the video surveillance system of the company that owns the office building, installed in common access areas. The images from these areas are collected and processed by the company that owns the office building, which is a controller in connection with this processing activity. For any queries regarding this processing activity, please contact them.

**B. How we collect your personal data**

We collect the personal data you provide to us voluntarily, when you submit your application, as well as subsequently, at the time of the interview and/or the assessment. Please be advised that you are free to decide whether or not to provide us with such personal data and there is no adverse effect for you. However, it is not possible to carry out the recruitment process without certain categories of necessary data such as data processed for the purpose of evaluating you for the position you applied in view of concluding an employment contract with you.

In addition, we may collect your personal data necessary for recruitment from various recruitment websites where you may have made your applications available for potential employers.

### **C. The purposes and the legal grounds of processing**

The collection of personal data is strictly limited to what is necessary for the purpose of carrying out activities related to the recruitment process and will be strictly limited to these purposes:

- (i)* Your personal data is processed for verifying your general training and compatibility with the Company and the desired job and to contact you with regard to your application, based on a prefiguration of the conclusion of a contract.
- (ii)* In case your application is declined following the recruitment process or our offer was denied by you, we will retain your data, based on our legitimate interest in being able to respond to any complaints or requests made in connection with the conduct of the recruitment process.
- (iii)* Also, to ensure security within the Company, we keep under video surveillance certain points of interest (*e.g.* entry and exit points within the building, common areas), based on the Company's legitimate interest to protect our values and the premises and thus, we can also process video images with you.
- (iv)* Also, if you have reached the final stage of the recruitment process, before the conclusion of the individual employment contract or any other contract that produces similar effects, it is necessary for the Company to consult your criminal record, in order to ensure safety and security of business and customer information and given the US legislation (Violent Crime Control and Law Enforcement Act of 1993) which prohibits an insurance company, such as the parent,-company, from employing or receiving services from individuals which were convicted of felonies involving dishonesty or breach of trust and given the internal regulations implemented at group level. Please be advised that you are free to decide whether or not to provide us with your criminal record. In order to comply with the applicable legal provisions, the consultation of the criminal record shall be made only based on your consent. We assure you that we will not record in any way your criminal record, the data contained therein or lack of such data, the Company doing only a verification in this regard before the completion of the recruitment process.
- (v)* Also, your subsequent contact as a rejected candidate for information on other career opportunities within the Company and your invitation to another interview or assessment possible only based on your consent.

We will inform you before processing your personal data for any purpose other than those for which you have given us your personal data, unless this subsequently purpose is incompatible with the original purpose, in which case we will also require your consent to the subsequent processing activity.

#### **D. Retention period**

Personal data will be stored for a limited period of 3 years, this period being determined by taking into account the moment of completion of the recruitment process and the Company's legitimate interest in retaining the data of unsuccessful candidates for the possible settlement of complaints or requests formulated.

Also, if you are not recruited for the job in question, you may be contacted in the future, in order to bring to your attention other career opportunities within the Company, if you have given your consent in this respect, in which case we can contact you for a period of 1 year after completing the recruitment process. After this period, you will no longer be contacted for possible career opportunities, unless you have specifically requested otherwise.

As regards your data collected through the Company's video surveillance system (*i.e.* your images), your images will be retained for a period up to 30 days.

If the storage of personal data is required by express legal provisions, we may continue to store your personal data for as long as required by those legal provisions.

#### **E. Third parties**

Your personal data may be disclosed to the following third parties, in their capacity as processors:

- Payfront Technologies India Private Limited for the purpose of providing HR support & payroll services;
- MassMutual Global Business Services Romania SRL, for the purpose of providing payroll and personnel management services providers and IT infrastructure services;
- Massachusetts Mutual Life Insurance Company (US) for the purpose of providing payroll and personnel management services providers and IT infrastructure services.

The Company has concluded with these service providers contracts comprising mandatory clauses on ensuring the security, integrity and confidentiality of your personal data.

As regards to the transfer of your personal data to the US to Massachusetts Mutual Life Insurance Company, and to Romania to MassMutual Global Business Services Romania SRL, the Company has implemented adequate safeguards, in accordance with the provisions of the GDPR, namely standard contractual clauses.

#### **F. Security of personal data**

The Company will take all necessary organizational and technical measures in order to ensure the security, integrity and confidentiality of your personal data.

## G. Your rights

Please be informed that if you have expressed your consent to the processing activities, you may withdraw this consent at any time with future effects. Such withdrawal will not affect the lawfulness of the processing performed prior to the withdrawal of the consent. As a general rule, in cases where you withdraw your consent, the Company will no longer allow the processing of your personal data and will take appropriate action to delete any records with your personal data. However, if the processing could be based on other legitimate grounds under the applicable legal provisions, the Company will proceed with that processing and inform you accordingly.

You have the following rights to process your personal data:

- i. ***The right of access to personal data.*** You have the right to request access your personal data processed by the Company.
- ii. ***The right to rectification.*** You have the right to obtain from us the rectification of your incorrect, incomplete or outdated personal data. Depending on the purpose of the processing, you may fill in incomplete personal data, including by means of an additional statement.
- iii. ***Right to erasure ("the right to be forgotten").*** You have the right to ask us to delete your personal data. Personal data whose retention is in accordance with the legal provisions cannot be deleted.
- iv. ***The right to restriction of processing.*** In the circumstances provided by law, you may request the restriction of the processing of your personal data.
- v. ***The right to data portability.*** You may request us to transfer you or to another data controller of a copy of your personal data that the Company processes about you.
- vi. ***The right to object to the processing of your personal data. You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us and we can be required to no longer process your personal data. If you have a right to object and you exercise this right, your personal data will no longer be processed for such purposes by us. Exercising this right will not incur any costs.***

## H. Exercise your rights

If you have any questions regarding the processing of your personal data or if you wish to make any request to us and exercise any of your rights with respect to the processing of personal data, please contact Ravi Tangirala at RTangirala@massmutual.com.

Each request will be reviewed as soon as possible but no later than one month.

*Any change to the information contained in this Privacy Notice will be brought to your attention. No change to the Privacy Notice will affect the rights conferred by the law.*

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