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# Employee Privacy Notice

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# Zerra DC - Employee Privacy Notice

AGP DC Infra Private Limited (hereinafter referred to as “AGP DC Infra”, “We”, “Us”, “Our”) is committed to protecting the privacy of employees, interns and, any other personnel employed in work – for -hire basis (referred to as “Employees”, “You”, “Your”, “Data Principal/s) and Processing Your Personal Data in accordance with the provisions of the Digital Personal Data Protection Act, 2023 (hereinafter referred to as “the Act”).

By virtue of Your employment under the terms of the Employment Agreement, We as a ‘Data Fiduciary, are responsible for determining how Your Personal Data is held and processed. As per section 5 of the Act, We are required to inform You about the manner in which We collect and Process Your Personal Data, Your rights as a Data Principal, and the procedures available to You for raising grievances in relation to this Privacy Notice (hereinafter referred to as “Notice”).

We encourage You to read this Notice carefully and in conjunction with any other Notices, contractual clauses and consent clauses that may apply in relation to the collection, processing and disclosure of Your Personal Data by Us.

## 1. How and what Personal Data do We collect about You?

We may collect Your Personal Data through various channels, including employment platforms, directly from You via email, or through external recruitment agencies or consultants.

The data We collect from You or from external agencies at the time of employment, includes but are not limited to:

- Personal identification data - Name, address (including pin code), personal email address, date of birth, gender, photograph, phone number, city, and country of residence
- Government Identifiers - Data that enables Us to identify You e.g. Aadhaar and PAN Card or any other identification
- Work History - Years of service, work location, work record, and Your employment type (on-roll or off-roll)
- Educational and training information - Senior secondary school, graduation, post-graduation certificates, courses undertaken, educational awards, certificates, and licenses, vocational records
- Any documents of record We require to verify Your health and sickness information, including data procured to determine Your fit-to-work status
- We may additionally collect Your dependent and Beneficiary data – Name, Age, Gender, relationship, Adhaar card, Pan card etc.

The Personal Data We collect from You during the course of Your employment includes:

- Information related to Your usage of the company’s assets, information and communication systems, including device use and monitoring
- Training information including in–house training attendance
- Records of holiday, sick leaves and other absences
- Medical history, medical records and other health data
- Data needed for compliance and risk management, such as grade/position/designation, disciplinary records, appraisals, manager and peer review, security data, payroll or benefits-related information,

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salary and insurance information, dependents, government identifier or tax numbers, bank account details, UAN and employment related benefits data

2. Lawful basis for processing Your Personal Data

We only collect and Process Personal Data about You where We have a lawful basis. Lawful basis on which We would Process data from You includes:

- Obtaining explicit Consent from You, unless the lawful basis is Legitimate Use
- Legitimate Uses where Processing is necessary for the purposes specified under section 7 of the Act, namely:
  i. Where You voluntarily provide Your Personal Data for a specific purpose and have not indicated that You do not consent to its use, We may Process such data solely for that purpose
  ii. When required to fulfil any obligation to disclose information under a law currently in force in India
  iii. Where Processing is necessary to comply with any court order, judgment, or legal obligation under Indian law or applicable foreign laws for civil or contractual matters
  iv. To respond to a medical emergency involving a threat to life or immediate threat to health of any individual
  v. For providing medical treatment or health services during an epidemic, outbreak, or any threat to public health
  vi. To ensure the safety, provide assistance, or deliver services during disasters or breakdowns of public order, as defined under the Disaster Management Act, 2005
  vii. Where Processing is required for employment-related matters or to protect the employer from potential loss or liability. This includes purposes such as prevention of corporate espionage, protection of intellectual property or trade secrets, and provision of employee benefits or services

3. How do We use Your Personal Data?

We will Process Your Personal Data for activities necessary for employment purposes. The purposes for which We may Process Your data, include but are not limited to:

- Fulfilling Our obligations as an employer, including implementing, managing and enforcing the terms of Your employment
- Supporting Your professional growth through relevant learning and development programs
- Monitoring and maintaining records of Your attendance, departure, sick leaves, casual leaves
- Enrolling You in employee insurance schemes and, where applicable, extending coverage to Your dependents based on the options selected
- Accessing, reviewing and resolving employee complaints/ grievances
- Managing performance reviews, setting performance expectations, and making decisions related to salary adjustments, incentives, compensation, promotions, and the continuation of Your employment
- Resolving grievances, legal disputes involving You, or other employees, workers, and contractors, including accidents at work
- Monitoring Your use of Our information and communication systems to ensure compliance with Our policies.
- Meet legal and regulatory obligations, comply with applicable laws, codes of practices, guidelines, or rules to assist in law enforcement and investigation conducted by the Government or The Data Protection Board or any other Supervisory Authority

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- Fulfilling any additional purpose necessary to meet the obligations under Our employment contract with You

4. How do We protect Your Personal Data?

We take reasonable technical and organizational measures to protect all Personal Data from unauthorized Processing or accidental disclosure, alteration, misuse, destruction or loss or unauthorized access and modification that compromises the confidentiality, integrity, and availability of such data.

Our safeguards include, but are not limited to:

- Encryption technologies
- Role based access control mechanisms
- Secure servers and firewalls
- Employee confidentiality agreements and training

While Security cannot be guaranteed, we strive to protect your Personal Data and constantly review and enhance our Information Security measures.

5. Disclosure/sharing Your Personal Data

Purpose of disclosure –

We may disclose Your Personal Data only where We are legally obliged to do so, or to fulfil the purposes of collection. Such disclosure is made solely under strict contractual obligations to ensure the confidentiality and protection of Your Personal Data.

We may disclose Your Personal Data with the following individuals/bodies, but this is not limited to:

- Third Parties – We may use third parties to carry out certain activities (such as payroll processing, external audits), to help run Our business and provide You benefits (such as health insurance schemes)
- Government and Regulatory Authorities – We may disclose Your Personal Data to Government and regulatory authorities only if We believe that the disclosure is in accordance with or required by, applicable laws, regulation, Audit, to fulfil legal obligations, etc.
- Within Our company and group – Your Personal Data may be shared within the AGP group of companies.
- We may share Your Personal Data with any recipient when reasonably necessary only in events such as a life-threatening emergency.

6. Your rights in connection with Your Personal Data

We respect Your rights in relation to Your Personal Data, and We will respond to requests to exercise Your rights under the Act. Where applicable, We will take reasonable steps to fulfil Your request.

**You have the following rights:**

- **Right to access data:** You can contact Us for a summary of Your Personal Data, the Processing activities undertaken with respect to such Personal Data, the details of all other Data Fiduciaries and Data Processors

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with whom Your Personal Data has been shared by Us along with the description of the Personal Data so shared, and any other information related to its Processing

- **Right to request correction:** If Your Personal Data is incomplete, inaccurate, misleading, or out of date, You can inform Us about the same and Your Personal Data will be corrected, completed, or updated upon due verification
- **Right of grievance redressal:** You have the right to raise grievances regarding the Processing of Your Personal Data. In case of any grievance, You can seek redressal of the same by reaching out to Us. If You are not satisfied with the resolution provided You may lodge Your complaint with the Data Protection Board established under the Act
- **Right to nominate:** In the event of Your death or Incapacity, You can nominate any other individual to exercise such rights on Your behalf
- **Right to withdraw Your consent**: You can withdraw Your Consent easily by emailing Us on the contact information provided in Clause 8. The Consent previously granted for the Processing of Personal Data will remain valid until You withdraw it. It will not affect the lawfulness of the Processing until the withdrawal. However, opting out may result in cessation of the respective services

We may require reasonable time to fulfil Your right to withdraw consent, and We shall notify You regarding the fulfilment of the request and its consequences of Us acceding to the same, including any legal consequences which may affect Your rights and liabilities to Us

For exercising any of Your rights, You can contact Us using the information provided in Clause 8. We will need You to furnish proof of Your identity before You can exercise these rights. We may not be able to Process any requests made in the event You fail to establish Your identity, or if We are unable to authenticate Your identity.

## 7. Storage and retention of Your Personal Data

Your Personal Data is stored securely and retained only as long as it is necessary to fulfil the purpose for which the data was collected. We will delete Your Personal Data upon Your request or once the retention period defined in Our Data Retention Policy has expired. However, We may archive and/or retain Your Personal Data where required to comply with applicable legal or regulatory retention requirements, or to establish, exercise, or defend legal claims that are not time-barred.

## 8. Contact information

If You have questions or comments regarding this Notice or wish to express Your grievances regarding the Processing of Your Personal Data, please contact Us using the contact details given below:

Email ID: compliance@zerradc.com

## 9. Your duty to inform Us of any change

We take reasonable measures to ensure that Your Personal Data remains accurate, complete, and up to date. However, maintaining the accuracy of this information is a shared responsibility. We request that You promptly notify Us of any changes or inaccuracies in Your Personal Data through contact information provided in Clause 8.

## 10. Privacy Notice Update

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We reserve the right to change this Notice at Our sole discretion at any time. Any material changes to this Notice will be posted on the internal website/portal. We encourage You to review this Notice regularly to be informed of such changes. The updated Privacy Notice will take effect as soon as it has been updated.

This Notice was last updated as of: 22 July 2026

**Annexure**

## 11. Definitions

- Consent - Any freely given, specific, informed, and unambiguous indication of the Data Principal's agreement to process their Personal Data
- Data Fiduciary - Any person, company, or entity that determines the purpose and means of Processing Personal Data
- Data Principal - The individual to whom the Personal Data relates. This includes job applicants, employees, customers, vendors, etc.
- Data Processor - Any person or entity who Processes Personal Data on behalf of a Data Fiduciary
- Data Protection Board - A statutory body under the DPDPA responsible for monitoring compliance, adjudicating disputes, and enforcing penalties
- Incapacity – The inability to exercise the rights of the Data Principal under the provisions of this Act or the rules made thereunder due to unsoundness of mind or infirmity of body
- Legitimate Use - Specific situations under the Act where Processing can be done without explicit consent (e.g., employment, legal obligation, medical emergency, etc.)
- Personal Data - Any information concerning the personal or material circumstances of an identified or identifiable individual, e.g. name, address, bank details, etc.
- Processing - A wholly or partly automated operation or set of operations performed on digital Personal Data, and includes operations such as collection, recording, organisation, structuring, storage, adaptation, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction

Note that other terms used in this Notice shall have the meanings given to them in the Act.

Name: _____

Signature: _____

Date: _____