

Information notice for job applicants

Dedalus DH Healthcare Software Services India Private Limited (“Dedalus”) attaches a great deal of importance to and intends to pay particular attention to protecting your personal data and respecting your privacy.

The aim of this privacy policy (the “**Policy**”) is therefore to inform you of how your personal data is processed when you submit your application for a position within Dedalus (paid employment, internship, etc.).

In this regard, please note that Dedalus is deemed to act as the controller of your personal data (hereinafter referred to as “**we**”, “**us**” and “**our**”). Please refer to Section 7 (“*How can you contact us?*”) below to access the contact details.

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WHAT PERSONAL DATA DO WE COLLECT?

We collect the following categories of personal data about you:

- Identification data (e.g., surname, first name, date of birth, etc.).
- Professional and educational data (e.g., resume, identity of your current employer (if applicable)).
- Evaluation data regarding your professional skills, including the results of practical tests performed during the recruitment process
- Personal data (i.e., data relating to your personal life, as it appears on your resume or that you voluntarily convey in your exchanges with us, such as your hobbies or your marital status).
- Economic data (e.g., your current salary and salary expectations, etc.).
- Health-related data (e.g., information regarding disability) and other special categories of data (e.g., racial, or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership) if applicable pursuant to local legislation.
- Data related to criminal convictions and offences, if authorized by local laws.

The following additional information per the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, applies to you:

- **Sensitive personal information:** the following information would be considered as “Sensitive personal information” or “Sensitive personal data”:
 - (i) password;
 - (ii) financial information such as Bank account or credit card or debit card or other payment instrument details;
 - (iii) physical, physiological and mental health condition;
 - (iv) sexual orientation;
 - (v) medical records and history;
 - (vi) Biometric information;
 - (vii) any detail relating to the above clauses as provided for providing service; and

- (viii) any of the information received under above clauses for processing, stored or processed under lawful contract or otherwise.

The provision of your personal data is voluntary, but in most cases, we will be unable to process your application properly without it. For example, if you refuse to provide us with reasonably required information regarding your educational and professional background, we will be unable to determine whether your profile meets the needs of the position and will have to reject your application.

In any case, we will inform you when it is mandatory to provide your personal data.

Additionally, if you provide us with personal data belonging to third parties (e.g., contact details for people with whom we can verify your references), you undertake to ensure that such persons have been duly informed of the processing of their personal data in accordance with this policy and, if required, have consented to the processing of their personal data.

The personal data may be collected directly from you or can be provided by third parties (such as, previous employers to verify your references) and/or publicly accessible sources.

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WHY DO WE USE YOUR PERSONAL DATA?

The table below outlines the purposes that we process your personal data for and, for each purpose, the legal basis for the processing operation in question:

PURPOSES	LEGAL BASIS
Processing of your application to: (i) determine the suitability of your profile for the position in question; and (ii) make you an offer if we believe that your profile matches the position that you have applied for.	The legal basis of the processing is your consent and the performance of the necessary steps to enter a potential employment contract with you. If special categories of data (such as, data relating to your health, your membership of a trade union and/or your political opinions, racial and/or ethnic origins, philosophical and/or religious beliefs, etc.) is processed in this context, the legal basis for such processing is your consent.
Site access and security management, including video surveillance if you are interviewing on our premises	The processing is based on your consent and our legitimate interest to protect people, premises, and property.
Compliance with the applicable legal framework	Need to comply with a legal obligation that we are subject to.
Management and follow-up of potential disputes	The processing is to defend our interests, including through legal action.
Processing your request to receive our job alerts	Your optional consent.

In any case, please note that we will not process your personal data for any other purpose that is incompatible with the above-mentioned purposes.

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WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In the context of our processing operations, we may communicate your personal data (after obtaining your consent) to the following recipients:

- to our service providers, suppliers, agents, and contractors, to the extent that they assist us in carrying out the purposes set out in this policy (e.g., we use IT service providers to host your personal data on our behalf).
- to other entities of the Dedalus Group.
- to competent courts, public authorities, government agencies and law enforcement agencies (including where we are required to comply with legal or regulatory requests).

Regardless of the recipient, we will only disclose your personal data to them on a strictly need-to-know basis and only to the extent required to fulfill the purposes identified in this policy.

We do not sell your personal data.

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DO WE TRANSFER DATA OUTSIDE INDIA?

In connection with the processing operations described in this policy, we may transfer your personal data outside India. In this context, we ensure that the level of protection your personal data is given is not adversely affected by such transfers.

This specifically means that each of the intended transfers is based on the fact that the transferor maintains the same level of data protection as Dedalus India.

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HOW LONG DO WE STORE YOUR PERSONAL DATA FOR?

We store your personal data for no longer than is necessary for the purpose of the processing concerned.

In other words, this means that the storage periods we apply vary depending on the purpose for which we process the data in question. The table below therefore indicates, for each purpose, the storage period that will be applied to your personal data:

PURPOSES	STORAGE PERIOD
Processing of your application to: (i) determine the suitability of your profile for the position in question; and (ii) make you an offer if we believe that your profile matches the position that you have applied for.	If the application is unsuccessful, the data will be kept until the end of the recruitment process or, at the latest, for 6 months after the end of the process concerned.
Compliance with the applicable legal framework	For the duration of the limitation period of the obligations that we are subject to

Management and follow-up of potential disputes	For the duration of the dispute and until all potential remedies have been exhausted
Processing your request to receive our job alerts	Until your consent is withdrawn

We have also defined an archiving policy. This ensures that your personal data is not stored in the active database unnecessarily.

In any case, once the applicable storage period has elapsed, we will irrevocably erase or anonymize your personal data so that you can no longer be identified.

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WHAT RIGHTS DO YOU HAVE?

In accordance with the applicable data protection legal framework, particularly the GDPR, you have the following rights as a data subject:

- You may request access to your personal data and request that it be rectified or erased.
- You may request, review and rectify your personal information;
- You also have the right to request that processing of your personal data be restricted or to object to the same.
- You have the right to portability of your personal data.
- Withdraw consent in relation to the processing or transfer of your personal information (including sensitive personal information). However, you should note that your personal information is necessary for the conclusion and/or performance of the employment or engagement contract with Dedalus India. If you do withdraw consent, the affected processes may be delayed or rendered impossible, and we may be precluded from continuing our relationship with you.

However, please note that some of the above rights are subject to specific conditions dictated by the applicable data protection legal framework. So, if your specific situation does not meet these conditions, we will unfortunately be unable to comply with your request.

To exercise your rights, please contact our DPO or relevant authority prescribed under applicable data protection framework using the contact details provided in Section 7 (*How can you contact us?*). To process your request as efficiently as possible, we may ask you for certain additional information to confirm your identity and/or assist in locating the personal data that forms the subject matter of your request.

If you have any questions or requests regarding our processing operations with your personal data under this policy, including exercising your rights, as outlined above, you may contact us on the following address: jayakumar.ganesan@dedalus.com

We also have appointed a data protection officer (“DPO”), which you can contact by e-mail at the following address: dpo.group@dedalus.eu

In case of grievances or discrepancies concerning our processing of your data, you may contact the Grievance Officer – at grievanceofficer-india@dedalus.com

Current version: [Dedalus – job applicant privacy policy – v. 2]

Last updated: March 2025

Acknowledgement and Consent:

I acknowledge receipt of the Information notice for job applicants (“Notice”) dated September 2022

I understand its contents, including those regarding the collection, use, storage, disclosure, transfer, and other processing of my personal information, including sensitive information by Dedalus.

By clicking on the consent button below, I hereby consent to the collection, use, transfer, disclosure, storage and retention of personal information, including sensitive personal information, in the manner and for the purposes described in the Notice.