

**B MEDICAL SYSTEMS INDIA PRIVATE LIMITED
RECRUITMENT PRIVACY POLICY**

1 Introduction

As part of your application at **B Medical Systems India Private Limited**, hereinafter 'we', 'us', or 'B Medical Systems India Private Limited', we collect and process certain personal data and information including sensitive personal data or information relating to you. Based on applicable data protection and privacy law in India, we collect, receive, possess, store, deal or handle information of provider of information with respect to such personal data and information including sensitive personal data or information provided by the provider of information (**'Controller'**).

In this Recruitment Privacy Policy, we set forth which personal data we collect about you, for what purposes, for how long we keep these data and to whom your personal data may be disclosed. This Recruitment Privacy Policy also includes important information regarding processing of your personal data.

From time to time, we may need to update this Recruitment Privacy Policy or the tables attached to it. The most recent version of this Recruitment Privacy Policy will always be available on our website through the following link: www.bmedicalsistemas.com

This Recruitment Privacy Policy uses many terms, such as 'personal data', 'processing' or 'controller, whose meaning may not be entirely clear to you. You will find their exact definitions with some practical examples below.

DEFINITIONS	
Consent (of the data subject)	<p>In the context of data protection, consent is an indication from a person (the 'data subject') that he or she agrees to the processing of personal data relating to him or her.</p> <p>Consent must be freely given, specific, informed and unambiguous.</p>
Controller	<p>The controller is the natural or legal person which (alone or jointly with others) determines the purposes and means of the processing of personal data.</p> <p>In other words, the controller is the one deciding <i>why</i> the data are used, for <i>which purposes</i> and <i>how</i> the data are processed.</p> <p>Example: B Medical Systems India Private Limited is the controller of its employees' and candidates' personal data.</p>

Data subject	<p>The data subject is any natural living person whose personal data are processed.</p> <p>Example: you, as a candidate of B Medical Systems India Private Limited, are a data subject.</p>
Data Protection Laws in India	<p>The Information Technology Act, 2000 (as amended or substituted from time to time), the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 and any other applicable data protection laws relating to the processing of Data, for the time being in force in India.</p>
Personal Data or information	<p>Personal data or information means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available and is capable of identifying such person.</p> <p>An 'identified' person is someone whose identity is known. An 'identifiable' person is someone who can be identified, directly or indirectly, on the basis of data.</p> <p>Data which – alone – may not enable to identify a person (e.g., gender + pin code), may become personal data once combined with other data (e.g., gender + initials + zip code).</p> <p>Example: your initials and the name of the company you work for are also personal data, because it is possible to identify you.</p>
Processing	<p>Processing is a general term describing any operation performed on personal data.</p> <p>This includes, for example, the collection, recording, organization, structuring, storage, consultation, modification, use, disclosure, transfer, restriction, erasure, anonymization or deletion of personal data.</p>
Processor	<p>The processor is the natural or legal person (or public authority or other body) which processes personal data on behalf of, or under the instructions of, the data controller.</p> <p>Example: the IT service provider of B Medical Systems India Private Limited is a processor.</p>
Profiling	<p>Profiling means any form of automated processing consisting of the use of personal data to evaluate certain personal aspects of an individual, in order to take important decisions (having a legal impact or similar impact) concerning him or her, or for analysing or predicting his/her performance at work, economic situation, personal</p>

	<p>preferences, interests, reliability, digital behaviour location or movements.</p> <p>Example: companies who track website users' behaviour on the internet to show them targeted ads based on their preferences are using 'profiling'.</p>
'Sensitive personal data or information'	<p>Some categories of personal data are by their nature particularly sensitive. These 'sensitive' data are given specific legal protection because their processing creates more risks for the data subjects.</p> <p>Sensitive personal data or information of a person means such personal information which consists of information relating to;—</p> <ul style="list-style-type: none"> (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 to body corporate for providing service; and (viii) any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise: <p>Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information.</p>

2 How do we collect personal data relating to you?

We may collect information about you in various ways:

- directly from you, for example personal data from your application documents and employment contracts, or personal data that you submitted in your CV or other forms in the course of your selection and recruitment process with B Medical Systems India Private Limited;
- from third parties, for example, personal data provided by employment or interim agencies, headhunters, insurers, working conditions services or public sources (e.g., professional social networks such as LinkedIn).

3 What personal data do we collect about you?

We only process personal data which are adequate, relevant and necessary in relation to your selection and recruitment process with B Medical Systems India Private Limited, and the services which are provided to you.

You will see below the personal data that we process about you ('**Recruitment Data**')

Identification information (such as your full name, language, gender, marital status and nationality)

Contact information (such as your address, telephone number, emergency names and contacts and email address)

National identifiers (such as identity card data, Aadhar Card, PAN card, Passport)

Information relating to your education and qualifications (education, studies, training, internships, additional qualification)

Information relating to your position, work and career (such as business title, employee type, management level, work location, position level, support roles, start and end date, job history, relieving letters, experience certificates)

Details and data regarding your immigration/visa/residency permit status

Data generated by interviewers and personnel involved in the recruitment process

Information relating to Income Tax Returns, such as PF, House loans, investments for tax exemptions and for computation of tax deductions

Referees (reference letters, names and contact details of referees)

When the personal data is necessary for the performance of the recruitment process or for compliance with a legal obligation to which B Medical Systems India Private Limited is subject, the provision of personal data is a requirement; if you refuse to provide us with this information, we will not be able to process your application form.

4 For what purposes do we process your personal data?

B Medical Systems India Private Limited is careful with your data and will exclusively use them for specified, explicit and legitimate purposes (the '**Processing Purposes**', as detailed below). B Medical Systems India Private Limited will not further use these data in a manner that would be incompatible with these Processing Purposes.

You will see below all these Processing Purposes:

- **processing recruitment applications, assessing your skills, qualifications and interests against our career opportunities and selecting candidates**
- **communicating with you during our recruitment process**
- **responding to and complying with requests and legal demands from regulators or other authorities** which involves the processing of identification data, contact details, information about your application
- **defending ourselves in any legal or court proceedings**

5 With whom do we share your personal data?

In the context of the purposes as described above, we may have to share your Personal Data with third parties (the '**Recipients**'). We will only share your Personal Data with trusted Recipients, when it is necessary or required for achieving the Processing Purposes. Your personal data will never be sold to third parties.

- **B Medical Systems India Private Limited Partner/s:** your personal data may be shared with B Medical Systems India Private Limited partner/s when strictly necessary. Please note it is our policy to limit the categories of individuals who have access to our Recruitment database.
- **Service providers/vendors (such as recruitment agencies or head-hunters, meal coupon providers)** that perform services on our behalf;
- **Public, regulatory or judicial authorities or bodies:** for compliance with employment and social security law, B Medical Systems India Private Limited may have to share specific Personal Data with public authorities or bodies and also disclose personal data in order to respond to requests of courts, tribunals, government or law enforcement agencies or where it is necessary or prudent to provide such information.

Whenever we permit a Recipient to access personal data, we will implement appropriate measures to ensure that the personal data is used in a manner consistent with the present Policy and that the security and confidentiality of the personal data is maintained.

6 Do we store or transfer your personal data abroad?

Some of the Recipients with whom we may share your personal data may be located in countries outside India.

Notably, B Medical Systems India Private Limited may share your personal data with B Medical Systems S.à r.l. located in Luxembourg.

B Medical Systems India Private Limited is committed to implementing the necessary safeguards to protect your data and your privacy rights. We shall ensure that any transfer of personal data complies with the applicable data protection laws.

Do we use 'profiling'?

No, B Medical Systems India Private Limited does not use profiling or any other method of automated decision-making without human intervention.

7 How long do we keep your personal data?

B Medical Systems India Private Limited will not retain your personal data and information including your sensitive personal data or information, for longer than is required for the purposes for which the information has been lawfully used or is otherwise required under any other law for the time being in force.

8 How you can access, correct information provided and withdraw of consent?

You may contact the Grievance officer (the details whereof are provided in clause 10 of this policy) –

- For any modifications / corrections required to the personal data and information including your sensitive personal data or information provided; and
- For withdrawal of consent to provide personal data and information including your sensitive personal data or information

9 Contact

To request to review, update, or delete your personal information or to otherwise reach us, please submit a request by e-mailing us at privacy@bmedicalsystemsindia.com. You may contact us for information on our Recruitment Policy and B Medical Systems Group Entities with whom we may share your Data in compliance with this policy and applicable law. We will respond to your request within 30 days.

10 Grievance Officer

Please see below the details of our grievance officer in India:

Name: Dhanashri Boga

Email: privacy@bmedicalsystemsindia.com