

ASPL Data Privacy Consent Statement

I hereby consent to the collection, processing, disclosure and transfer of my Personal Information, including Sensitive Personal Information, by Allstate Solutions Pvt. Ltd (ASPL) and its subsidiaries and affiliates in accordance with the Policy annexed hereto.

I specifically understand and agree as follows:

- that I am aware of and consent to the collection of Personal Information, including Sensitive Personal Information, about me;
- that ASPL is collecting my information for lawful purposes and that collection is necessary for those purposes;
- that ASPL may disclose or transfer my Personal Information, including Sensitive Personal Information, as indicated in the Policy and that I consent to such transfer;
- that ASPL will retain information collected about me for no longer than required for the lawful purpose for which it will be used or as permitted by law;
- that ASPL will use information collected about me only for the stated purpose for which it has been collected;
- that I may review information provided by me and may correct or amend inaccurate or deficient information;
- that I have the option not to provide the information sought by ASPL and that I may withdraw my consent; and
- that I have been advised of who I should contact if I have questions or grievances related to collection, processing or transfer of Personal Information about me.

By clicking Accept, you agree to the above terms. Your consent will be saved. If you click Decline, you will not be able to login.

Thank you.

Allstate Solutions Private Limited (ASPL)

Policy on Employee and Contractor Data Privacy

1. INTRODUCTION

Allstate Solutions Private Limited respects the privacy and values of our employees, contingent workers and contractors. Accordingly, we collect, process and disclose Personal Information (as *defined below*) in a manner consistent with the law. The purpose of this document is to set forth the policy with respect to handling and dealing with Personal Information of Data Subjects (as *defined below*). This policy is in conformance with prevalent Indian law, ASPL Code of Conduct, and Allstate Privacy policies, principles and standards.

2. SCOPE

This policy on data privacy (the “**Policy**”) applies to all Personal Information received by ASPL including electronic, paper or verbal information.

3. DEFINITIONS

For purposes of this Policy, the following definitions shall apply:

- **“ASPL”** or **“the Company”** means Allstate Solutions Private Limited, and each of its predecessors, successors and affiliates.
- **“Data Subject”** means an employee, candidate for employment, contingent worker or contractor of ASPL
- **“Personal Information”** means any information that relates to a natural person that, either directly or indirectly, either alone or in combination with other information available or likely to be available, is capable of identifying such person. For the purposes of this Policy, unless otherwise stated, “personal information” includes “sensitive personal information”, as defined below.
- **“Sensitive Personal Information”** consists of data relating to passwords; financial information including but not limited to bank account details; credit card and debit card details; physical, physiological and mental health condition; medical records and history; sexual orientation; marital and biometric information of employees and family members.

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 in effect shall not be regarded as Personal Information or Sensitive Personal Information for the purposes of this Policy.

4. PRIVACY PRINCIPLES

The privacy principles in this Policy have been developed based on Indian law.

ASPL collects and uses Personal Information in order to select, manage and administer its workforce and workforce data; run its business operations; and ensure the safety and protection of its workforce and resources and for any purpose ancillary or incidental thereto, as ASPL may deem fit. In collecting Sensitive Personal Information, ASPL obtains consent from the relevant individual for such collection and use of his/her Sensitive Personal Information.

For the protection of the information shared with ASPL and its affiliates for the purposes mentioned herein, ASPL and its affiliates have in place information security policies and procedures that contain managerial, technical, operational and physical security measures that comply with security standards as per the applicable law, for collecting, receiving, possessing, storing, dealing with or handling Personal Information of the data subject and protecting such information from unauthorized access, use, modification, damage, disclosure and impairment through multiple control points including but not limited to technology and operations controls. Details of these security practices and procedures are available on the Company intranet.

ASPL will use the Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. ¹ASPL will take reasonable

steps to ensure that the Personal Information is relevant to its intended use, accurate, complete, and current.

ASPL shall have the right to amend or replace this Policy and the security practices and procedures from time to time at its sole discretion and provide details of such amended or replaced practices and procedures. Notwithstanding anything to the contrary contained in this Policy, the publication of such practices and procedures on the Company intranet shall be deemed to incorporate such practices and procedures in this Policy.

The name of any agency that may collect and retain Sensitive Personal Information of the relevant individual on behalf of ASPL is available on the Company intranet. ASPL shall have the right to appoint or replace the agency (ies) collecting and retaining the Sensitive Personal Information by publishing it on the Company intranet. The publication of such details on the Company intranet shall be deemed to incorporate such details in this Policy and unless objected to by the Data Subject, it will be deemed that the Data Subject has consented to such replacement and appointment.

ASPL will disclose or transfer Personal Information only with the consent of the Data Subject or where such disclosure or transfer is necessary for the performance of a contract between the Data Subject and ASPL or for compliance with a legal obligation. Such transfers include (a) intercompany transfers from ASPL's offices in India to ASPL's affiliate offices in the United States, United Kingdom and wherever they may be located; and

(b) transfers to such third parties specified on the Company intranet. ASPL shall have the right to modify/ amend the list of third parties to which Personal Information may be transferred, by publishing the same on the Company intranet. The publication on the Company intranet shall be deemed to incorporate such details in the Policy. Such transfers shall be made only to jurisdictions and/or third parties which implement and maintain security practices and procedures not lower than the standards prescribed by applicable law. ASPL will obtain assurances from third parties to whom Personal Information is transferred that they will safeguard such information consistently with this Policy. Where ASPL has knowledge that a third party to whom Personal Information was transferred is using or disclosing such information in a manner contrary to this Policy, ASPL will take reasonable steps to prevent or stop the use or disclosure.

To the fullest extent required by applicable law, ASPL will offer Data Subjects the opportunity not to provide the Sensitive Personal Information and to withdraw their earlier consent. The Data Subject is not permitted to withdraw the consent provided pursuant to this Policy, unless the same is communicated to ASPL in writing.

Upon a reasonable request, ASPL may grant individuals reasonable access to correct, amend, or delete Personal Information that it holds about them. Additional management approvals may be required for same.

Any questions or concerns regarding the use or disclosure of Personal Information should be directed to ASPL's **Information Protection and Privacy Governance Officer (IPPGO)**, at the

address/email given below. ASPL will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information by reference to the principles contained in this Policy.

In the event that ASPL or its affiliates share, directly or indirectly with the relevant individuals, any Personal Information, the said individuals will be obligated, to use such Personal Information in accordance with the data security practices and procedures and internal privacy policy of ASPL as available on the Company intranet. Further, such Personal Information shall be used only in the course of employment and not for any personal use of the individual. In case of unauthorized use by the individual of such Personal Information, ASPL reserves the right to take disciplinary action including termination of the individual's employment at its sole discretion after providing him/her with a reasonable opportunity to be heard.

Questions or comments regarding this Policy should be submitted to the **ASPL Information Protection Coordinator (IPC)** in writing to:

Name: Saugata Das, Leader – Risk and Compliance	Email: Das, Saugata (ASPL) Saugata.das@allstate.com@allstate.com
Address: Allstate Solutions Private Ltd. (ASPL) RMZ Ecoworld, 7th floor, Building No 1, Devarabeesanahalli, Varthur Hobli, Bangalore 560037, Karnataka	Phone Number(s): Office: +181556 20743 Mobile: +91 - 96117 72092