	GGEPII PII Privacy Policy & Notices (Public-Facing)	Doc. No.	DPDPA/P&F/ITHRL/0003
		Rev. No.	01
		Effective Date	27.01.2026

GGEPII

DPDPA_PII_Privacy_P_N_GGEPII

GGEPII PII Privacy Policy and Notices (Public-Facing)

Version: 1.0

Date: 17.12.2025.

Owner: Data Protection Officer

Audience: Customers, website/app users, suppliers, job applicants, new joiners

1.0 Purpose:

We (GGEPII) are committed to protecting your personal data and privacy. The purpose of this policy explains what personal data we collect, why, how we use it, how long we keep it, who we share it with, and your rights under India's DPDP Act.

2.0 Scope:

The scope of this policy includes, but is not limited to, all external stakeholders like leads, prospects, customers, suppliers, job applicants etc. As new joiners and employees also transition between internal and external stakeholders at some point in time, the scope of this policy includes new joiners and employees also.

3.0 Description:

PII is collected from external stakeholders.

3.1 Personal Data We Collect


The following is a detailed explanation of various reasons for which PII is collected from leads, prospects, customers, suppliers, job applicants and new joiners and/or employees by GGEPII:

3.1.1. Full name, Age, Date of Birth, Family details - In order to enroll in PF or ESIC

3.1.2. Full name, Employee ID - In order that the new joiner or employee can use organizational assets

3.1.3. Salary details and break-up of all previous employment - In order to fix remuneration and other perks

3.1.4. Full name, Office mail ID - In order to send mail as well postal communication to new joiner or employee

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3.1.5.All medically related details including medical history - In order to provide medical insurance

3.1.6.Phone numbers - In order to inform friends and relatives of new joiner or employee in case of emergency

3.1.7.Self and parents' details, spouse's and children's details, PAN card, Aadhar card - In order to open a bank account for the new joiner or employee

3.1.8.Driving licence - In order to identify who is legally allowed to drive company-offered vehicles

3.1.9.Driving licence - In order to identify who is legally allowed to drive own vehicle

3.1.10.PAN card, Aadhar card - In order to enable new joiner or employee to take a house on rent, if the new joiner or employee is coming from another city or state

3.1.11.Full family details - To get nominee and family details for PF (Form 2), Gratuity (Form F) and ESIC

3.1.12.Full name, Age, Sex, Spouse details - To provide special privileges such as maternity leave, as applicable

3.1.13.Full name, experience certificates from previous organizations - To confirm eligibility for working at a particular job position

3.1.14.Full name, Date of birth - To get information on birthday, for providing half-a-day birthday leave

3.1.15.PAN card, Aadhar card - To confirm citizenship status


3.1.16.Family details, spouse's details, children's details - To confirm marital status and availability of children for allowing expenses to be proved for tax exemption purposes

3.1.17.Detailed resume - To understand past capabilities of the new joiner or employee for career planning

3.1.18.Full name, caste, religion - To provide local concessions or privileges based on caste or religion

3.1.19.Full name, unique identification marks - To re-confirm identification the new joiner or employee based on unique identification marks

3.1.20.Languages known - To confirm mode of communication to new joiner or employee using specific language or languages

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3.1.21. Detailed medical history - To understand the fitness and medical conditions of new joiner or employee to assess suitability to place of work

3.1.22. All Certifications - To align extra-curricular and sports activities of the new joiner or employee to extra-curricular and sport activities of our organization

3.1.23. Detailed resume - To perform SWOT analysis of the new joiner or employee for professional development

3.1.24. Detailed resume, references from previous organizations - For performing background checks of the new joiner or employee using senior references

3.1.25. Full name, mail IDs, employee ID - For identifying uniqueness in assets allocated to the new joiner or employee

3.1.26. Detailed medical history - For identifying emergency doctor or hospital related to new joiner or employee, to act immediately in the event of a health emergency

3.1.27. Detailed medical history - For recommending special tests to be taken by new joiner or employee, during annual medical check-up

(Only as necessary for lawful purposes)


3.2 Purposes & Legal Bases

- To fulfill contracts (orders, service delivery).
- To comply with legal obligations (tax, employment, safety).
- With consent (marketing communications, certain analytics).
- Legitimate uses permitted under DPDP, documented in our Lawful Basis Register.

3.3 Processing Details

- Retention: We retain personal data only as long as necessary for the purposes stated or as required by law, then securely delete/anonymize.
- Sharing: We share data with service providers (hosting, logistics, HR systems) under data processing agreements ensuring privacy safeguards.
- Cross-Border Transfers: Where transfers outside India occur, we implement safeguards per DPDP and document them in our Transfer Register.

3.4. Your Rights

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You may request access, correction, erasure, withdrawal of consent, grievance redressal, or nominate a person to act on your behalf. Submit requests via: privacy@luthragroupllp.in or our Privacy Portal.

3.5 Children's Data

Where children's data may be processed (rare), we obtain verifiable parental consent before processing.

3.6 Contact & Grievance

In case of grievances, kindly send details of grievance, and continued non-response from our organization, to the following mail ID:

DPO Email: DPO@luthraindia.com

Kindly mail if and only if there is no response from our organization's Managers, to your mails. Kindly ensure that your mails have all the required details. If your grievance is not valid, our organization can take suitable action against you, as per DPDP Act and Rules.

3.7. Updates

We may update this policy; latest version is available on our website.