

Leistung is committed to protecting the privacy of its employees, candidates, vendors/suppliers, customers/clients, and other stakeholders. This Privacy Policy is published in accordance with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("SPDI Rules") issued under the Information Technology Act, 2000, and the Digital Personal Data Protection (DPDP) Act, 2023, and describes how we collect, use, disclose, and protect Personal Identifiable Information (PII) and Sensitive Personal Data or Information (SPDI).

1. Information We Collect

Depending on your relationship with the Company, we may collect the following categories of information:

- Personal details: name, address, contact number, email, date of birth, photographs
- Sensitive personal data or information (SPDI): passwords, financial and bank account information, physical/physiological/mental health condition, sexual orientation, medical records and history, biometric information, and government-issued identification numbers (e.g., Aadhaar, PAN)
- Professional details: employment/engagement history, educational qualifications, references, and performance records (for employees/candidates)
- Commercial details: billing, invoicing, and transaction information (for vendors/customers)

2. Purpose of Collection and Usage

We collect and use your PII/SPDI strictly for the following purposes: -

- Recruitment, onboarding, and employment/engagement administration
- Vendor onboarding, contract management, and payment processing
- Customer onboarding, service delivery, billing, and support
- Compliance with applicable legal, regulatory, statutory, and audit requirements
- Internal record-keeping, security, and fraud prevention

3. Consent

Except where collection is otherwise permitted by law, we obtain your consent, in writing (including by fax or email), prior to collecting any SPDI. You have the option not to provide the SPDI or information sought; however, this may affect our ability to provide the relevant goods, services, or employment/engagement opportunity to that extent. You may withdraw your consent at any time by writing to the Grievance Officer or using the applicable Consent & Revocation Form, subject to applicable legal and contractual retention requirements.

4. Disclosure of Information

We do not disclose your PII/SPDI to any third party without your consent, except where such disclosure is: (a) necessary to fulfil a contractual obligation to you; (b) required to comply with a legal obligation; (c) made to government agencies mandated under law to obtain such information; or (d) required to be shared under an order of law. Any third party (including vendors/service providers) to whom PII/SPDI is disclosed shall not further disclose it, and shall be bound by confidentiality and data protection obligations at least as protective as this Policy.

5. Reasonable Security Practices

We have implemented reasonable security practices and procedures, including technical, administrative, and physical safeguards, that are commensurate with the information assets being protected, in line with our Information Security

Management System (ISO/IEC 27001) and internal procedures, to protect PII/SPDI against unauthorized access, damage, use, modification, disclosure, or impairment.

6. Retention and Deletion

PII/SPDI is retained only for as long as necessary to fulfil the purpose(s) for which it was collected, or as required by applicable law. Upon expiry of the retention period, fulfilment of purpose, or receipt of a valid deletion request, PII/SPDI is deleted or destroyed securely, in accordance with internal procedure and logged in the SPDI Deletion/Destruction Log.

7. Your Rights

Subject to applicable law and any contract with the Company, you have the right to:

- Review the PII/SPDI you have provided
- Request correction or amendment of any inaccurate or deficient PII/SPDI
- Withdraw consent previously given
- Request deletion of your PII/SPDI, subject to legal and contractual retention obligations

Such requests may be submitted using the applicable Consent & Revocation Form and will be addressed within 7 (seven) business days from the date of receipt.

8. Grievance Officer

For any grievances or complaints relating to the processing of your PII/SPDI, please contact our Grievance Officer at the details below. Grievances will be redressed expeditiously and in any event within one (1) month from the date of receipt.

Name of Grievance Officer	Mr. Hitesh Vyas
Designation	HR/Admin Head
Address	Survey No. 1009/2, 1004/3, 1005/1 & 2, Navsari Lat, Pirana Temple Road, Village- Paldi-Kankaj, Taluka - Daskroi, Dist-Ahmedabad-382425, Gujarat, India
Email	h.vyas@leistung.in
Phone Number	+91 93281 28423

9. Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable law. This Policy is reviewed at least annually. The updated Policy will be published on our website with the revised effective date.

10. Contact Us

For any questions regarding this Privacy Policy, please contact the Grievance Officer or the Data Protection Officer (DPO) using the details published on the Company's website.

This Privacy Policy is issued pursuant to, and should be read together with, Leistung's PII Procedure.