

1. Purpose

This policy outlines the LDS's commitment to protecting the personal data and privacy of employees. It ensures personal information collected, used, stored, and disclosed in a lawful, and transparent manner.

2. Scope

This policy applies to:

- All employees (permanent, temporary, trainees, apprentices, and contract workers).
- Personal data collected and processed during recruitment, employment, and post-employment.

3. Definitions

- **Personal Data:** Any information that identifies or can identify an employee (e.g., name, address, contact details, ID numbers, medical records).
- **Sensitive Data:** Includes health information, financial records, biometric data, or disciplinary records.
- **Processing:** Any operation performed on data (collection, storage, use, transfer, or deletion).

4. Policy Statement

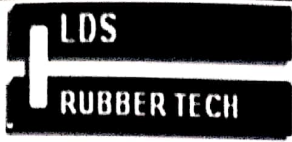
We are committed to:

- Collecting only necessary employee data for legitimate business, legal, or contractual purposes.
- Ensuring employee data is kept secure, accurate, and up to date.
- Restricting access to personal data on a need-to-know basis.
- Not sharing employee data with third parties without consent, unless required by law.
- Providing employees the right to access, update, or request deletion of their personal data (where applicable).

5. Data Collection & Use

Employee data may be collected for the following purposes:

- Recruitment, onboarding, and payroll processing.
- Benefits administration (health insurance, retirement plans, etc.).
- Performance management, training, and career development.
- Compliance with statutory/legal requirements.
- Workplace safety, security, and disciplinary actions.



EMPLOYEE PRIVACY POLICY

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6. Data Storage & Security

- Personal data will be stored securely in electronic and/or physical formats.
- Access will be restricted to authorized personnel only.
- Security measures (password protection, encryption, access logs) will be implemented.
- Data retention will follow legal requirements and organizational needs.

7. Employee Rights

LDS Employees have the right to:

- Access and review their personal data.
- Request corrections to inaccurate or outdated information.
- Withdraw consent (where applicable) for optional data processing.
- Raise concerns if they believe their privacy rights are violated.

8. Disclosure of Data

Personal data may only be disclosed:



- To government/regulatory authorities as required by law.
- To third-party service providers (e.g., payroll, insurance) bound by confidentiality agreements.
- With explicit employee consent (where required).

9. Non-Retaliation

Employees will not face retaliation for exercising their privacy rights or raising concerns about misuse of their data.

10. Review & Compliance

- This policy will be reviewed every **2 years** or earlier if laws/regulations change.
- Non-compliance may result in disciplinary action as per company rules.

Prepared by	Approved by
 ESG Coordinator	 Director / MD