Data Retention Policy for

PERSONAL INFORMATION/SENSITIVE PERSONAL INFORMATION

HR-PO856, Ver -3.0

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1. OBJECTIVE

- To define policy framework for retention of PI and SPI (as defined herein) controlled or processed by Tech Mahindra.
- To ensure compliance with data protection and privacy laws

2. SCOPE & APPLICABILITY

This Policy applies to all TechM's and its affiliates' officers, directors, employees, , that may collect, process, or have access to PI or SPI.

3. GLOSSARY

Definitions

Personal Data - Or

Personal Information (PI) – (Also known as Personally Identifiable Information - PII) means any information that, when used alone or combined with other data, may be used to identify a living individual.

Few examples

- Name
- Surname

Sensitive Personal Information (SPI) - means any Personal Information including but is not limited to:

- Password, ;
- Unique Identification Number
- National insurance number;
- Social security number;
- Race;
- Ethnic origin;
- Sexual orientation ;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union memberships);
- Criminal records;
- Legal investigations and proceedings;
- Financial information such as credit card or bank information;
- Health care and medical records;
- Biometric records;
- Performance asssessment records;
- Visa records;
- Payroll records;
- Disability Status;
- Military Status; and
  Compensation Details

4. RETENTION PERIOD, RULES AND DESTRUCTION

The documents and electronic records containing PI and/or SPI shall be retained for the period as stated below in the data retention schedule.

Once the decision is made to dispose any PI and/or SPI, whether in part or full, according to the data retention schedule, such data shall be permanently deleted (e.g. shift + delete) from all the electronic devices which may contain such PI and/or SPI. All physical records or documents containing PI and/or SPI shall be shredded; torn or permanently disposed off in any other appropriate manner, subject to any environmental and health & safety laws and policies.

It is the objective of TechM to retain any PI and/or SPI only for such periods as may be required as minimum as possible. However, PI and/or SPI may be required in future for various purposes like any Government inquiry, claims by concerned individuals or such other regulatory purposes. Therefore, PI and/or SPI will be required to be retained and maintained to meet such unknown and unanticipated requirements, for reasonable period.

There may be certain occasions any PI and/or SPI may need to be preserved by TechM beyond the limits set out in this policy, in which case we may retain such PI and/or SPI to the extent necessary for an extended period as required. These occasions include but may not be limited to:

- Legal proceedings or a regulatory or similar investigation or obligation to produce information / If TechM believes that documents may be relevant to any ongoing or prospective legal proceesings
- A crime is suspected or detected
- PI and/or SPI is necessary to document compliance with applicable laws

This policy shall be read with Data Privacy and Protection Policy, and therefore all the provisions of these policies shall apply to this policy to the extent relevant. However, to the extent of retention periods, this policy shall have overriding effect to Data Privacy and Protection Policy.

This policy is subject to any country specific Data Retention Policies, and country specific Data Retention Policies shall supersede this policy in case of any conflict or inconsistency.

DATA RETENTION SCHEDULE

The retention periods are as follows:

1. **Leave and Absense records** : Will be held for maximum of seven (7) years after employment ceases.
2. **Salary and Bonuses:** Will be held for a maximum of eight (8) years plus current year
3. **All data pertaining to unsuccessful Candidates and Candidates who did not join:** Will be retained for Six (6) months from date of last contact
4. **Personnel Files:** All PI, SPI in TechM's records in any form whatsoever (including in digital and electronic form) and personal files will be destroyed/deleted seven (7) years after employment ceases or as per the country specific regulation in case the regulation contains a different retention period (whichever is lower) subject to the following:
   a. there is no outstanding legal process,
   b. there are no outstanding dues from the employee to TechM; or
   c. there is no investigation in process by any competent regulatory authority.
5. **Training Records:** Will be destroyed seven (7) years after employment ceases or as per the country specific retention regulation in case the regulation contains a different retention period (whichever is lower) following:
   a. there is no outstanding legal process,
   b. there are no outstanding dues from the employee to TechM; or
   c. there is no investigation in process by any competent regulatory authority.
6. **Medical Certificates:** Will be destroyed seven (7) years after employment ceases.
7. **Recruitment and Eligibility to work:** Will be destroyed seven (7) years after employment ceases.
8. **All data pertinent to Associate's Background checks Reports / Associated Records /Supporting recruitment documents along with application form for employment** : Will be destroyed seven years after employment ceases

5. DOCUMENT HISTORY

Version	Date	Author (function)	Reviewed by	Approved by	Nature of changes
Issue 1.0	21-May-18	Legal and HR	HR, RMG, ISG	Sunil Sanger and Lucius Lobo	First integrated issue
Issue 2.0	18-May-20	Legal, Finance and HR	HR, RMG, ISG	Sunil Sanger and Lucius Lobo	Revised as per Finance Payroll inputs and as per Legal inputs.

Version	Date	Author (function)	Reviewed by	Approved by	Nature of changes
Issue 3.0	11-Nov-22	Legal, Finance and HR	HR, RMG, ISG	Sunil Sanger and Lucius Lobo	Revised as per Finance Payroll inputs and as per Legal inputs.