

Leap India Privacy Policy

Leap India Food & Logistics Pvt. Ltd. (“**Leap India**”) is committed to respecting the privacy of every individual who shares Personal Information¹ including “sensitive personal data or information”² (“**SPDI**”) with Leap India. Your privacy is important to Leap India and Leap India strives to take reasonable care in the protection of the information Leap India receives from you.

The terms “**You**” / “**Your**” / “**Yourself**” refer to the natural person whose Personal Information Leap India may collect, receive, possess, store, deal or handle. The term “Leap India” includes its subsidiaries.

Leap India has provided this Policy to familiarise You with:

- i. Statement of Leap India’s practices and policies with respect to processing of Your Personal Information;
- ii. The type of Personal Information that Leap India collects from You;
- iii. The purposes for collection of such Personal Information from You;
- iv. Leap India policy on sharing Your Personal Information with third parties; and
- v. Leap India’s information security practices and policies;
- vi. Leap India’s contact information.

The purpose of this Policy as amended from time to time, is to give You an understanding on how Leap India intends to collect, store, transfer and use the information that You provide to Leap India.

Kindly note that this Policy may be amended / updated from time to time. Your continued engagement with Leap India will imply Your acceptance of such updates to this Policy.

1. Personal Information collected

Personal Information for the purposes of this Policy may include:

- Basic information regarding You such as name, contact details, address, gender, birth date, marital status, children, parents’ details, dependent details, photos, photo ID proof, PAN card, passport, voter ID, Aadhaar card, life insurance nominees/beneficiaries, fingerprint information, emergency contact details, citizenship, visa, work permit details;
- Recruitment, engagement or training records including CVs, applications, notes of interview, applicant references, qualifications, education records, test results (as applicable);

¹ “Personal Information” means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

² Sensitive personal data or information includes the following kinds of Personal Information capable of identifying a person: (i) passwords; (ii) financial information such as bank accounts, credit cards, debit cards; (iii) physical, physiological and mental health condition; (iv) sexual orientation; (v) medical records and history; (vi) biometric information.

- The terms and conditions of employment/engagement, employment contracts with Leap India and/or previous employer;
- Performance, conduct and disciplinary records within Leap India;
- Leave records (including annual leave, sick leave and maternity leave);
- Financial Information relating to compensation, bonus and benefits, salary, travel expenses;
- Any other Information as required by Leap India for the purpose of Your engagement with Leap India.

Such Personal Information may be collected in various ways including during the course of Your relationship with Leap India.

2. Purpose for collecting Your Personal Information

Leap India collects Your Personal Information for various purposes, including the following:

- Managing Your employment/work with Leap India including deployment/assignment of the individual to specific client projects;
- Record-keeping purposes; payroll administration, payment of Your salary or invoice; performance assessment and training;
- Audits, analysis and statistics, for example of various recruitment and employee retention programs;
- IT, security and access controls;
- For any other purposes as Leap India may deem necessary for Your relationship with Leap India.

(Collectively referred to as “**Purposes**”)

Leap India may also remove all the personally identifiable information and use the rest of the data / information for historical or statistical purposes.

The collected Personal Information shall be processed in a manner compatible with the Purposes; except if the use for a different purpose is permitted by applicable law.

3. Sharing of Your Personal Information

Leap India may transfer, share, part with all or any of Your Personal Information for one or more of the Purposes or as may be required by applicable law, across the world with Leap India’s affiliates / agents / third party service providers / partners / banks and financial institutions.

You also agree that collection, disclosure, storage, processing and transfer of any Personal Information or any other information shall not cause any loss or wrongful gain to you if the same is used for the Purposes stated in this Policy.

You acknowledge that some countries where Leap India may transfer Your Personal Information may not have data protection laws which are as stringent as the laws of Your own country. You acknowledge that it is adequate that when Leap India transfers Your Personal Information to any other entity within or outside Your country of residence, Leap India will place contractual obligations on the transferee which will oblige the transferee to adhere to the provisions of this Policy.

4. Retention and Deletion of Personal Information

It is Leap India's policy to retain certain Personal Information provided by You when You cease to be associated with Leap India. This Personal Data may be required for Leap India's legal and business purposes, including any residual activities, including for example, provision of references, processing of applications for re-employment/re-engagement.

All Personal Information provided by You may be retained for periods as prescribed under law or as per Leap India Policy from the date Your relationship with Leap India is ceased. The Personal Information may be retained for a longer period if there is a subsisting reason that obliges Leap India to do so, or the Personal Data is necessary for Leap India to fulfil contractual or legal obligations.

Once Leap India no longer requires the Personal Information, it is destroyed appropriately and securely or anonymized in accordance with the law.

5. Security

The security of Your Personal Information is important to us. Leap India strives to ensure the security, integrity and privacy of Your Personal Information and to protect Your Personal Information against loss, misuse, unauthorized or accidental access, disclosure, alteration and destruction. Leap India has implemented policies and maintains appropriate technical, physical, and organizational measures and follows industry practices and standards in adopting procedures and implementing systems designed for securing and protecting Personal Data from unauthorized access, improper use, disclosure and alteration.

While Leap India will endeavor to take all reasonable and appropriate steps to keep secure any information which Leap India holds about you and prevent unauthorized access, you acknowledge that no electronic medium / security measure is 100% secure and that Leap India cannot provide any absolute assurance regarding the security of your Personal Information. Leap India is not responsible for any breach of security or for any actions of any third parties that receive Your Personal Information.

Notwithstanding anything contained in this Policy or elsewhere, Leap India shall not be held responsible for any loss, damage or misuse of Your Personal Information, if such loss, damage or misuse is attributable to a Force Majeure Event (as defined below).

A "Force Majeure Event" shall mean any event that is beyond the reasonable control of Leap India and shall include, without limitation, sabotage, fire, flood, explosion, epidemics, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, etc.

6. Contacting Us

Leap India can address any questions, comments and concerns that You may have about Leap India's online privacy practices and policy. Please write to Ms Yatika Vasudevan at yatika.v@leapifl.com.

If You find any discrepancies or have any grievances in relation to the collection, storage, use, disclosure and transfer of Your Personal Information under this Policy, please contact Leap India's Grievance Officer. Leap India will endeavour to respond within an appropriate timeframe and resolve each complaint within 30 days from the date of receipt of Your complaint.

The name and contact details of Leap India's Grievance Officer is provided below for reference.

Name: Ms Yatika Vasudevan

Contact: yatika.v@leapifl.com

The Grievance Officer shall redress Your grievances expeditiously and in any event within the period prescribed under law. In case of any queries regarding the content, interpretation, You may contact the Grievance Officer.

Notwithstanding the above, Leap India reserves the right to decline to process any such request which may jeopardize the security and confidentiality of the Personal Information of others, as well as requests which are impractical or not made in good faith, or the circumstances as provided for under the law permitting Leap India to refuse such request(s).

7. Consent

By [signing this policy / clicking on the "I accept" button], You hereby consent to the collection, storage, and processing of any or all of Your Personal Information, as well as sharing and transfer of Your Personal Information across borders and from your country and jurisdiction (including India) to any other

countries and jurisdictions across the world, by Leap India as specified under this Policy. You acknowledge that You are providing Your Personal Information out of Your free will.

You will have the option to not provide your consent, or withdraw any consent given earlier, provided that the decision to not provide consent / withdrawal of the consent is intimated to Leap India in writing as per the contact information provided in this Policy. If you do not provide Leap India Personal Information or withdraw the consent to provide Leap India with any of your Personal Information at any point in time, Leap India shall have the option not to provide the benefits for the purpose of which the said Personal Information was sought.

Last updated: [-]