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## **Employees', Consultants', and Employment Candidates' Privacy Notice**

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### Who are we (Introduction)?

Emeritus (together with its relevant subsidiaries, associates, and affiliated companies as listed in [Annexure-1](#) of this Notice, collectively referred to as "Emeritus", "us", "we", or "the Company") is committed to protecting and securing the confidentiality of, and to lawfully handling and effectively managing the personal data we collect from our employees, consultants, and employment candidates.

### Our Vision and Mission Statement

(Global Data Protection Office at) Emeritus is committed to maintaining trust, meeting expectations, and upholding the rights of the individuals whose personal data we collect by efficiently protecting their personal data, diligently complying with the applicable privacy laws, persistently adhering to the privacy principles, and conscientiously following the privacy best practices. We understand the value of personal data and the significance of its processing in running our business, and we reinforce our pledge to remain bound to our obligations of fairness and transparency while handling personal data and related operations.

### What is the purpose of this notice?

This Employees', Consultants', and Employment Candidates' Privacy Notice ("Notice") outlines and describes how personal data or information of employees, consultants, and employment candidates is collected, managed, and processed by Emeritus. Emeritus is committed to handling the personal data of its employees, consultants, and employment candidates with fairness and transparency, and in a lawful manner. This Notice covers the minimum controls and obligations that Emeritus is committed towards for ensuring that the personal data of our employees, consultants, and employment candidates is collected, used, retained, and disclosed in a secure, lawful, transparent, and compliant manner.

### Whom is this notice directed to (Scope)?

This Notice *inter-alia* applies to employees, consultants, and employment candidates (collectively "you", "your") of the Emeritus entity that:

- you are presently employed with (or were, in the past in case of former employees/consultants);  
or

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- you have made employment related enquiries to; or
- you have applied or expressed interest (by submitting your resume or a job application) for employment (full-time or contractual) via the online job portal, recruitment event, or any other similar event or channel.

This Notice also covers “you” as an intern or a recruit for short-term assignment(s) and is designed to inform you of the personal data that we collect, our purposes of processing that data and your rights in connection with it.

Please note that there may be cases from time to time where we need to update this Notice, for example to reflect changing legal requirements or processing activities, and in the event, we make any material changes to this Notice then we will let you know.

This Notice does not apply to personal data belonging to other categories of individuals like our marketing leads, students, program applicants, faculty members, vendors, or clients engaged with or by Emeritus. See our [Privacy Notices](#) page for more information. As more than one of the above notices may apply to you depending upon the context in which your personal data is collected and processed (e.g., an employee may also be a student), be sure to carefully read each applicable notice that we provide to you so that you are fully informed.

### What other rules or notices apply?

In some cases, local laws and regulations that apply to the processing of your personal data may be more restrictive than this Notice. Those more restrictive requirements will apply in that case. Emeritus will provide you with additional privacy notices or information where applicable law(s) so require. Residents of the United States (U.S.) should see our **U.S. Privacy Notice** which supplements this and our other privacy notices for them. In addition, this Notice may be supplemented from time to time with more specific privacy information or notices, for example when you use a particular Emeritus app or portal.

### What are the categories/types of personal data we collect about you?

The personal data that we collect, and process may vary depending upon the role, designation, and obligations arising under applicable laws of the location (country) of the job-opening/position in question and/or of the concerned Emeritus entity. The personal data that we collect from you is stored within the electronic records/database stored on servers (including cloud servers) located in Singapore, Japan, Canada, U.S., India or in another country (including third countries that are not covered by an adequacy decision of the European Commission), as well as within physical records/database.

Emeritus collects the personal data only to the extent it requires it for a particular purpose(s), and it may collect, including but not limited to, the following types of personal data from you:

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Categories of personal data	Examples of personal data attributes within each category
Identification/Identity data	Full name, alias, gender, title, country of residence, nationality, citizenship, location, marital status, online identifier, IP address, date of birth, place of birth, age, photograph, biometric data (as part of any government-issued ID), race, proof of eligibility to work
Contact details	Home address, work address, phone number, email address, emergency contact details
Other joining details	Family details like dependents' information, parents' details, spouse's details, children's details
Financial data	Bank account information, social security number, tax identification number (including PAN), remuneration details from previous organization(s) (including perquisites, bonus, benefits), past salary slips, pension details, provident fund, tax deductions, current compensation (salary) and perks, CTC details
Educational and employment data (history)	Educational qualification, certifications, number of years of work experience, dates of hire and exit, job function, industry, job title, recent/current compensation (salary), name of the employer, rewards and recognition, professional memberships and licenses, employee ID, appraisal details, information generally included in a CV/resume, notice period
Role and position (employment) specific requirements	Employee category and status (full-time/part-time/intern/contracted), roles and responsibilities, reporting structure, working hours, employee ID, relocation preference, expected compensation (salary), country work authorization, professional reference(s) and recommendation(s), information required for overseas travel (official trips) or immigration, work permits and eligibility, information for initiating/conducting background verification and checks (including criminal history, health checkups, and drug testing) according to country-specific requirements and applicable laws, details for conducting credit checks, trainings completed, information required for initiating and conducting disciplinary proceedings, security camera (CCTV) footage, data generated through usage of official laptops and other assets (including location), reason for leaving and exit interview

Electronic identification data	Login ID, password, IP data, website visit logs, browser details
User generated data	Interview responses, psychometric and behavioral assessment report, personality assessment report, video and audio recording during online interviews, video and audio recording during (online) official meetings or townhalls or other events, information generated during background verification and checks (including criminal history, health checkups, and drug testing) as per country-specific requirements and applicable laws, information generated during credit checks, presence and absence records (attendance), time sheet records, leave records (including reason, like vacation, personal, etc.), periodic performance evaluations and appraisals, promotion/demotion reports, career progress, complaints and suggestions, reports and findings from disciplinary proceedings, time and location of facility (including restricted areas) ingress and egress
Government-issued ID (including copy thereof)	National ID (including Aadhaar/UID and NRIC), passport, any other acceptable government document
Health information	Disabilities and special accommodation needed by you, blood group, sickness, allergies, meal preferences, maternity/paternity details
Other personal details	Personal references, language(s) proficiency, hobbies and interests, responses to employee surveys, feedback and suggestions, general/random information (not necessary for the employment management) like mother's maiden name or pet's name for verifying your identity for resetting your login credentials in case of lost/forgotten particulars including your username and password

### Sensitive personal data

Sensitive personal data or special categories of personal data (“SPD”) are personal data which are particularly sensitive in nature and merit specific protection as the context of their processing could create greater risks to the fundamental rights and freedoms of the individuals. SPD, if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. The examples of SPD may vary depending upon the context and the laws of the respective countries from where the SPD originates and may include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, sex life or sexual orientation, or data concerning health.

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Emeritus may require collecting or processing sensitive personal data or special categories of personal data as covered in the table above. Should we require SPD for managing your application or employment with Emeritus, or for any other related purpose(s), we will obtain your explicit consent towards such collection and processing in terms of this Notice at the point where the SPD will be disclosed by you.

Where the applicable law(s) provide other legal bases for processing SPD (as an exception to obtaining explicit consent), we may rely upon such legal basis as may be available to us in a particular situation. In the event you voluntarily disclose/share/upload/post/make public your SPD on our website, or any other public forum owned or controlled by us, you understand that the said SPD may be processed by us in accordance with the applicable law(s) and this Notice.

### **Personal data of others provided by you**

In certain situations, you may provide to us the personal data of others (for example, your friends, colleagues, family members, etc.) such as in the context of providing emergency contact details, or professional references towards your application, etc. In addition, you may also provide personal data about your family members or other beneficiaries for effective administration of health insurance benefits, term plan, retirement benefits, etc. as part of your employment.

In such cases, you are responsible to inform the individual(s) and/or obtain their authorization (where legally required) towards processing of their personal data for the purposes communicated to you.

### **How do we collect your personal data (Source)?**

#### **Personal data collected directly from you on our job portal**

Emeritus collects your personal data that we require in order to assess your candidature for the role you have applied for. You may either provide the required personal data by creating a fresh account on our website (job portal) or, in some cases, authorize third party platforms like LinkedIn to share with us the data available with them. The remaining personal data attributes (that have not been updated on your chosen third-party platform) shall be additionally collected from you.

It is your responsibility and obligation to ensure that all personal data submitted to us is accurate, correct, complete, and up to date at the time of submission. Failure on your part to do so may adversely affect your candidature. Please keep us informed of any changes to your personal data.

#### **Personal data collected from other legitimate sources**

Individuals (like, our present or past employees, recruiters, head-hunters, etc.) may refer candidates to us for various roles and positions open with us. We may receive your personal data towards your candidature from the following (but not limited to) sources:

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- Global job portals such as Naukri, Monster, IIMjobs, Glassdoor, Instahyre, Internshala, LinkedIn, who have been authorized by you to share your personal data available with them with us, for the purpose of your candidature towards job-opening/role/position you are interested in.
- Search engines like Google.
- Individual referrals from sources like our present or past employees, other candidates, etc.
- Third-party vendors like staffing companies, head-hunters, recruitment consultants etc.
- Events like campus recruitment, job fair, etc.
- Vendors conducting background verification and checks during the advance stages of your candidature.

If you have been referred to us by another individual, you may still be required to register yourself on our job portal for completing the interview, recruitment, and onboarding process. You may be asked to again provide the personal data initially provided to us by your referrer, along with the additional information (personal data), as required.

#### **Personal data collected directly from you during the employee onboarding process**

Once you have cleared the interview process and an employment offer has been rolled-out to you (and accepted by you), we may ask you to submit additional information and documents that were not collected as a candidate, since they were not required at that stage, for completing your onboarding process as an employee.

#### **Personal data generated before (as a candidate) and during your employment with Emeritus**

Some or all the attributes listed under 'User generated data' category of personal data will be generated during your evaluation as a candidate like, at the time interview, verification, etc., and at the time of onboarding as an employee and during your term of employment. We may store and maintain this data in our records (about you) or in any other relevant database.

#### **Personal data of others provided by you**

In situations where you provide to us the personal data of others, as covered under the section 'How do we collect your personal data (Source)?', it becomes your responsibility to inform the individual(s) concerned about the processing of their personal data for the relevant purposes and to confirm to us that you have been authorized to submit such details with us for processing for our legitimate interests.

#### **Personal data collected via tracking technologies**

When you visit our website or use our service, we and third parties may use cookies and other tracking technologies to collect personal data from you. This may include tracking your activities across time

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and third-party sites or services. For more information about this processing and your choices regarding it, see our [Cookie Notice](#).

## Why do we collect your personal data?

### Purpose(s) of processing

Emeritus uses your personal data, including your sensitive personal data, for the following primary purposes (not exhaustive) related to your job application, screening, onboarding, and employment:

#### Job application (recruitment) process:

- Assessing and managing your application for the job-opening/position that you have applied for or for other open roles (that match your profile) within Emeritus entities around the world as a part of end-to-end recruitment process.
- Conducting verification (as permitted under applicable laws) including background verification, credential verification, criminal verification, drug testing, etc.

#### Onboarding process and during employment:

- Processing your offer of employment.
- Conducting applicable background and reference checks.
- Managing your payroll, incentives, and benefits (including health insurance and term plans).
- Fulfilling your training, learning, upskilling needs and supporting other career development initiatives.
- Conducting periodic performance reviews.
- Managing complaints and conducting investigations.
- Arranging for business travels and/or relocation.
- Complying with regulatory requirements.

### Lawful (legal) basis for processing

Privacy law of certain jurisdictions require that one of the available lawful bases of processing, as prescribed by such privacy law, must be relied upon (satisfied) by Emeritus before processing your personal data for each of the purposes listed earlier. The lawful basis that Emeritus relies upon for a particular processing activity may differ from the lawful basis relied upon for another processing activity i.e., different lawful bases may be relied upon to lawfully conduct different processing activities.

All or some of the following lawful bases of processing may be available under the privacy law of a particular jurisdiction (country):

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1. **Consent:** You have given consent (explicit/express or deemed/implied, depending upon the privacy law applicable) to the processing of your personal data for one or more specific purposes.
2. **Performance of a contract:** Processing of your personal data is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
3. **Compliance with legal obligation:** Processing is necessary for compliance with a legal obligation to which Emeritus is subject.
4. **Protection of vital interests:** Processing is necessary in order to protect your vital interests or of another natural person.
5. **Public interest:** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
6. **Legitimate interest:** Processing is necessary for the purposes of the legitimate interests pursued by Emeritus or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms under applicable data protection laws.

Processing of sensitive personal data or special categories of personal data ('SPD') has been covered earlier under the section 'What are the categories/types of personal data we collect about you?'

The most common processing activities under each purpose that we use (process) your personal data for, along with the respective legal basis for our processing activities, are listed below:

Purpose of processing (along with respective processing activities)	Lawful (legal) basis for processing
<b>Evaluation, assessment, and hiring</b>	
Evaluating your application and assessing your eligibility for the role you have applied for and other roles that may match your profile.	<ul style="list-style-type: none"> <li>• Legitimate interest (finding suitable candidate for the role)</li> <li>• Performance of contract (taking steps prior to signing employment contract if you are selected)</li> </ul>
Conducting psychometric, behavioral and personality assessment	<ul style="list-style-type: none"> <li>• Legitimate interest (finding suitable candidate for the role)</li> </ul>
Conducting face-to-face and/or online (remote) interviews, with audio/video recording (if necessary).	<ul style="list-style-type: none"> <li>• Legitimate interest (finding suitable candidate for the role)</li> </ul>

	<ul style="list-style-type: none"> <li>• Consent (for audio/video recording)</li> </ul>
Assessing your eligibility/authorization to work in the country of role/position in question.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract (taking steps prior to signing employment contract)</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
Calculating and making you an offer with monetary compensation and non-monetary benefits (CTC) if you're selected.	<ul style="list-style-type: none"> <li>• Performance of contract (taking steps prior to signing employment contract)</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
<b>Verification</b>	
Verifying documentation related to your identity, educational qualification, reference, and work experience, etc.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> </ul>
Conducting background verification and checks (including criminal history, health checkups, drug testing, and credit checks), as per country-specific requirements and permitted under applicable laws.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract (taking steps prior to signing employment contract with you)</li> </ul>
Sanction checks/screening in compliance with applicable sanction laws across geographies (for example, sanctions list of the Office of Foreign Assets Control).	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
<b>Onboarding</b>	
Creating your account and generating employee login details including username and password.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> </ul>
Generating employee ID and issuing identity card.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> </ul>
<b>During the employment term</b>	

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Assigning you to a function/team and establishing a reporting structure.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> </ul>
Planning and managing your work schedule and roles and responsibilities.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> </ul>
Managing relocation, transfer, secondment, and official travel (including processes related to visa requirements, immigration and work permits).	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> </ul>
Assisting you with your career development including learning and upskilling initiatives.	Legitimate interest
Facilitating your participation /attendance to seminars, webinars events, and other programs, related to the organization and your role.	Legitimate interest
Facilitating collaboration with other employees.	Legitimate interest
Conducting investigation and taking action on disciplinary matters related to you.	Legitimate interest
Audio/video recording of official meetings, townhalls, and other similar events.	Legitimate interest
<b>Reviews and appraisals</b>	
Conducting periodic review and evaluation of your performance during your employment.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> </ul>
Planning and managing your career progress including promotion, performance improvement, demotion, termination, etc.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> </ul>
<b>Administration and management</b>	
Processing your payroll and employee benefits (including those related to your dependents) during and post termination of employment.	<ul style="list-style-type: none"> <li>• Performance of contract</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
Tracking your attendance and managing absence records.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> </ul>
Recording and maintaining timesheets.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Performance of contract</li> </ul>

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Maintaining leave records with reasons, like vacation, personal, health, maternity, etc.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
Maintaining active directory of your employment details including contact information and location accessible by other employees across the globe.	Legitimate interest
Sending surveys, including employee satisfaction surveys, for receiving feedback and suggestion to understand and enhance overall employment experience.	Legitimate interest
Maintaining records related to usage of and access to buildings and facilities (including restricted areas).	Legitimate interest
Verifying your identity for resetting your login credentials in case of lost/forgotten particulars including your username and password.	Legitimate interest
Securing IT assets and organizational data using multi-factor authentication mechanism.	Legitimate interest
Investigating and addressing your complaints, grievances, and issues.	Legitimate interest
Investigating and addressing complaints, grievances, and issues against you.	Legitimate interest
Submitting records and reports required by the regulatory authorities.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
Complying with applicable laws, rules, regulations, codes of practice or guidelines and associated administrative activities:	
Responding to requests by government or law enforcement authorities conducting any investigation.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
Using personal data in connection with legal claims or litigation.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>

Complying with directions, orders including subpoenas or other legal process(es) of competent courts, legal or regulatory bodies (including but not limited to disclosures to such regulatory bodies).	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
Investigating, preventing, or taking suitable action regarding illegal activities, suspected fraud, security issues, enforcing our terms and conditions, or this Notice, or to protect our rights, property, or safety, and those of others.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Public interest</li> </ul>
Processing personal data for audit checks and other regulatory purposes.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
Implementing whistleblower program (or other complaint mechanism) and setting-up of hotline and web-portal for collecting whistleblower reports (anonymous or identified).	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
Monitoring and ensuring network and information security, including preventing unauthorized access to our systems and preventing attacks through virus, malicious software etc., and ensuring business continuity.	Legitimate interest
Managing and controlling access to official assets and equipment in including laptops, telephones, IT assets, etc.	Legitimate interest
Monitoring office area and facilities using CCTV and other security and surveillance technologies.	Legitimate interest
Ensuring compliance with employment terms and conditions (contract) and applicable policies and procedures.	Legitimate interest
Ensuring compliance with regulatory obligations associated with your employment.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>
Internal reporting and/or accounting purposes.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Compliance with legal obligation (in case of EU and UK)</li> </ul>

Successors in the event of a merger, acquisition, or reorganization.	Legitimate interest
<b>Other purposes</b>	
Sending you job alerts (as a candidate) based on your profile or internal job postings (as an employee).	Legitimate interest
Communicating and coordinating with external parties including clients and vendors.	Legitimate interest
Organizing and managing special events like team building exercises, sports competition, health events, LGBTQ+ events, etc.	Legitimate interest
Training our workforce/employees on different processes that may involve processing of your personal data.	Legitimate interest
Conducting business analytics, marketing research, and data analysis.	Legitimate interest
For business planning and continuity purposes.	Legitimate interest
Exit (resignation or termination) management conducting exit interviews.	Legitimate interest
Ex-employee engagement communications.	Legitimate interest
For any other purpose as disclosed to you at the point of collection or pursuant to your consent.	Consent
Maintaining emergency contact information and making appropriate arrangements in the event of an emergency.	Protection of vital interests
Making suitable arrangements and special accommodations due to your health reasons including temporary or permanent disability.	<ul style="list-style-type: none"> <li>• Legitimate interest</li> <li>• Protection of vital interests</li> </ul>

Where Emeritus wishes to use your personal data for a new purpose that has not been included in the table above, Emeritus will process your personal data, for such new purpose, as per the provisions of the applicable privacy law(s). Where required, Emeritus will notify you of the new purpose in accordance with the applicable law(s) and obtain your consent (or rely on any other lawful basis available with us) before processing your personal data for the new purpose.

#### **Legitimate interest as the lawful (legal) basis for processing – additional information**

You have the right to object at any time, on grounds relating to your situation, to processing of your personal data carried out for our legitimate interests or of a third party.

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Please refer to the section ‘What are your rights with respect to your personal data?’ for more details.

### **Performance of a contract as the lawful (legal) basis for processing – additional information**

Please note that if you fail to provide certain information when requested then we may be unable to take steps towards entering into a contract with you at your request, or where we have an existing agreement with you to perform our contractual obligations under that agreement.

### **Consent as the lawful (legal) basis for processing – additional information**

Where the collection and use of your personal data is based on your consent, you are entitled to withdraw that consent at any time by contacting us (please refer to the ‘Contact Us’ section of this Notice), or by contacting your HR business partner or the concerned recruiter (if you are a candidate). Please note that your withdrawal of consent could have an adverse impact on our ability to engage with you and would not affect the lawfulness of processing that has already occurred based on your consent.

### **With whom do we share your personal data (Disclosure)?**

#### **Disclosure within the Emeritus group of companies (affiliates)**

Emeritus is a global company, and we may share your personal data or provide such access to other companies within the Emeritus group as affiliate service providers, or as data controllers for the performance of contract with you or for our legitimate interest. This Notice also applies to the processing activities of our affiliates on your personal data in such contexts and is provided for and on behalf of those affiliates where they also act as controllers of your personal data, including those listed under Annexure-1 of this Notice.

#### **Disclosure to third party service providers**

Emeritus may share your personal data with the following third-party service providers. These third-party service providers will require access to your personal data to perform certain limited functions for Emeritus however, they may not generally use, for their own purposes, your personal data that they process:

- Technology service providers like network and IT security, internet services, video communications, customer support and communication, telecom services for running the business operation and protecting it from external and internal threats.
- Service providers for business continuity management and contingency planning in the event of business disruptions.
- Training and LMS platforms for completing the company-assigned trainings.
- Skill assessment platforms for conducting work-related assessments.

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- Document management and execution platforms for signing of contracts and other documents on our behalf.
- Employer of Record (EOR) service providers in the regions where we deem necessary to engage an EOR in conformity with other applicable laws of that region.
- Service providers offering human resource management system (HRMS) tools and platform for automating and streamlining HR processes.
- Service providers that manage and process employee payroll for us.
- Service providers conducting sanction checks and screening.
- Tools and platforms for making outbound calls to prospective customers and recording those calls.
- Service providers hosting surveys and feedback forms for us.
- Service providers providing office tools, audio-video conferencing platforms (with option to record the meeting/conference), collaboration platforms, etc.
- Travel agents and visa processing agents to make arrangements for business travel.
- Local transportation vendors like cab service providers.
- Third-party service providers for establishing and implementing whistleblower program by setting-up and independently managing hotline and web-portal for collecting whistleblower reports (anonymous or identified).

We take reasonable steps, such as obtaining contractual commitments from our third-party service providers, to limit and protect the use of your personal data by our service providers.

#### Disclosure to other third parties

Emeritus may share your personal data with the following (non-agent) third parties (list not exhaustive):

- Professional advisors and consultants including law firms, tax consultants, business/management consultants, auditors etc. for running the operations efficiently and in a compliant manner.
- Professional advisors and consultants managing background verification (BGV), reference checks, credit checks, health checks, etc.
- External members, advisors, and professionals who are part of internal committees like disciplinary, grievance redressal, ethics, POSH (Prevention of Sexual Harassment at Workplace), etc.
- Regulatory authorities and government bodies including those related to taxation, health, human resources, social security, etc. to comply with applicable orders, rules, regulations as an organization.
- Hotels and airlines to make arrangements for business travel.
- Prospective (and actual) sellers or buyers and their advisers in connection with any financing, merger, acquisition or sale of any of our business or assets.
- Prospective or actual clients or vendors or university partners for official communication and business transactions.

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- Data collection forms (e.g., Google Forms) where Emeritus shall provide only your contact detail (generally only the email address) to trigger the notification and the link to the form. Personal data provided via the said form may be also available to the third-party providing the service and you are advised to read the privacy notice (policy) and terms & conditions of the third-party before entering any personal data into the form.

We share your personal data with the (non-agent) third parties primarily for our legitimate interest or complying with our legal obligation but may also rely upon one of the other lawful bases, listed under the section 'Lawful (legal) basis for processing', that may be legally available to us. Where required by the applicable privacy law(s), we will seek your consent before sharing your personal data with the third parties. Third parties with whom your personal data has been shared may, in some cases, independently determine the purposes and uses of your personal data; in such cases, that third party recipient's own privacy policy (notice) will govern their use of your personal data.

#### Disclosure without notification

In some cases, or circumstances, we may disclose your personal information to third parties without notifying you. These circumstances could include:

- Where Emeritus is required to do so as per applicable laws/rules/regulations, or by order of a court, tribunal, or any other regulatory authority, or other legal process or compulsion.
- Where Emeritus, in good faith, believes that such disclosure is reasonably necessary to comply with a legal obligation, process, order, or request.
- Where Emeritus is legally required to or believes in good faith that such disclosure is reasonably necessary to safeguard the rights, property or other interests of Emeritus, its employees, vendors, clients, customers of clients, third parties or the public as required and permitted by the applicable law(s).
- Where provision of the information would be disproportionate or would result in the impossibility or serious impairment of achieving the objectives of processing.

#### International (cross-border) transfer of personal data

Due to the global nature of our business which comprises of partnership with various universities across the globe with international student enrolments to the courses and programs offered, presence of several Emeritus group companies (affiliates) worldwide, vendors/service providers (processors) that are present in and operating out of different countries and facilitate and support our services, and other third parties (esp. those listed in the earlier section) established in an overseas location, your personal data may be shared, disclosed, or transferred to these parties in other countries where the privacy and data protection law(s) may differ from those in your country. The cross-border transfer may include transfer to third countries (including onward transfers) that are not covered by the adequacy decision of the European Commission (Secretary of State in case of UK).

The cross-border transfer of your personal data shall be done in compliance with the concerned provisions and requirements of the privacy law(s) applicable on your personal data that may *inter-alia* include:

- In the case of personal data within scope of the privacy law(s) of the European Economic Area (EEA) or United Kingdom (UK), your personal data may be transferred cross-border on one of the following bases:
  - When such transfer is being done to a country or a territory that is covered by an adequacy decision issued by the European Commission (Secretary of State in case of UK).
  - When such transfer (to a non-adequate third country) is necessary for the performance of contract between you and Emeritus.
  - When we have provided for appropriate safeguards in the form of Standard Contractual Clauses (SCCs), adopted by the European Commission (Information Commissioner in case of UK), signed with the recipient of your personal data in the non-adequate third country.
  - When we have obtained explicit consent from you after informing you of any possible risks of such transfer to a third country for you as an individual due to the absence of an adequacy decision and appropriate safeguards.
- In the case of personal data within scope of the privacy law(s) of countries other than the European Economic Area and United Kingdom, your personal data may be transferred cross-border on one of the following bases:
  - Emeritus has signed appropriate data transfer and/or processing agreement with the recipient of your personal data in the other country.
  - Under any other provisions and/or conditions enabling such transfer as provided by the privacy law(s) applicable on your personal data.

### How long do we retain your personal data?

Emeritus will retain your personal data for as long as necessary for the purpose(s) for which it has been collected, in accordance with the applicable law(s), and as set out in our retention policy and/or schedule. The duration for which we retain your personal data may differ depending upon the purpose(s) it's being processed for.

We will retain and use your personal data to the extent necessary to comply with our legal obligations, for example, to comply with statutory audits, resolve disputes, comply with orders or requests issued by competent court(s), and enforce our legal agreements and policies.

In some circumstances we may anonymize your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### How do we protect your personal data (Data Security)?

Emeritus implements appropriate technical and organizational measures to ensure security of your personal data and to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services. These measures are designed to prevent accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed by us.

We make every reasonable effort to ensure safety and security of your personal data in accordance with the applicable law(s) and industry standards while considering the state of the art, the costs of implementation and the nature, scope, context, and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons. Despite all our efforts, risk of personal data breach persists as no method of internet transmission or storage guarantees complete security. In an unlikely event of a personal data breach, we will assess and investigate the event and take necessary actions, including those related to notification to the relevant supervisory authority and to the individuals impacted, in compliance with the applicable law(s) within the timelines prescribed.

### What are your rights with respect to your personal data?

You may check and update certain personal data within our systems either by logging to your password-protected account (in some cases) or by contacting your HR business partner or the concerned recruiter (if you are a candidate). It is your responsibility to ensure that your personal data, that you have shared with us, is accurate, correct, complete, and up to date in our records.

Privacy laws in some jurisdictions, especially those in the European Economic Area (EEA) and the United Kingdom (UK), and in some U.S. states, provide individuals with certain rights in relation to the processing of their personal data (subject to conditions and exceptions provided in such laws). These rights are jurisdiction-specific and may not be available to all. For example, in case you are located in the European Union (EU) (or UK) or our affiliate that you interact with (that collects and processes your personal data) is located in the EU (or UK), all of the rights listed below may be available to you. Some or all these rights (and even some additional rights) may be available to you under the privacy law(s) of other jurisdictions as well but that depends upon the scope of privacy law(s) applicable on your personal data. U.S. data subjects should see our **U.S. Privacy Notice** for more details related to their rights.

- **Right of access:** to obtain from us a confirmation as to whether or not personal data concerning you are being processed.
- **Right to rectification:** to get your inaccurate personal data corrected or rectified, and incomplete personal data completed.
- **Right to erasure:** to have your data deleted (this is not an absolute right and is subject to exemptions available under the applicable privacy law).
- **Right to restriction of processing:** to obtain restriction of processing.

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- **Right to data portability:** to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format and have it transmitted to another controller.
- **Right to object** on grounds relating to your particular situation especially where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Right to object to automated decision making and profiling:** to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you.

We will process your request to exercise the above rights in accordance with the law(s) applicable in relation to the rights exercised by you. As permitted by applicable law, we may refuse requests that are unreasonably repetitive, require disproportionate technical effort, risk the privacy of others, may compromise an ongoing investigation, or are impractical. We do not discriminate against you for exercising any of your rights in a manner that would violate applicable law.

As a policy, Emeritus allows you to access your personal data, verify and challenge the accuracy and completeness of your personal data, and have it corrected, amended, or deleted if inaccurate and, in limited circumstances, object to processing of your personal data even if the law in your jurisdiction does not accord you those rights, but we will apply our discretion in how we process such requests except as otherwise required by applicable law. We may require you to establish your identity and provide evidence to justify the amendment of your personal data held by us. You can exercise these rights by contacting us per the Contact Us section below, or in the case of U.S. data subjects as set forth in our **U.S. Privacy Notice**.

In addition, we enable you to exercise certain choices regarding cookies and certain other tracking technologies, as explained in our [Cookie Notice](#).

To exercise a data subject right or make an inquiry about your personal data, please contact your HR business partner or the concerned recruiter (if you are a candidate) or write to us at [privacy@emeritus.org](mailto:privacy@emeritus.org). We may need to verify and confirm your identity before we process and fulfill your request. This is another appropriate security measure to protect your personal data.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights) unless, and subject to applicable law, your request for access is clearly unfounded, excessive, or repetitive. Alternatively, we may refuse to comply with the request in such circumstances in accordance with the applicable laws.

**Right to complain:** You may have the right to lodge a complaint with your local data protection authority about our processing of your personal data. For more information, please contact your local data protection authority. We would, however, welcome the opportunity to discuss, address, and

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resolve your concerns before you reach out to your local data protection authority. So, please contact us in the first instance at [privacy@emeritus.org](mailto:privacy@emeritus.org).

### Contact us.

Any questions, concerns, or complaints about the operation of this Notice can be addressed to the Data Protection Officer at [privacy@emeritus.org](mailto:privacy@emeritus.org). In addition to contacting your HR business partner or the concerned recruiter (if you are a candidate), you may submit your concerns or complaints about our privacy practices to our Data Protection Officer at [privacy@emeritus.org](mailto:privacy@emeritus.org) or at the following address:

Emeritus Institute of Management  
78 Shenton Way,  
#20-02 Singapore-079120

Whenever we receive a formal complaint, we attempt to contact the complainant individually and resolve his/her grievances and/or concerns truthfully and with utmost transparency.

In addition to contacting us, in certain countries you have the right to lodge a complaint with your local data protection authority if you so choose.

In case you are located in the European Union (EU) or United Kingdom (UK), you may contact our representative in the EU or UK:

#### Global Alumni (for the EU)

- by emailing: [EURep@Emeritus.org](mailto:EURep@Emeritus.org)
- by writing to Global Alumni at Calle Acanto, 11, 28045, Madrid, Spain

#### EIM Learning UK Ltd. (for UK)

- by emailing: [UKRep@Emeritus.org](mailto:UKRep@Emeritus.org)
- by writing to EIM Learning UK Ltd. at WeWork, 10 York Road, London, England, SE1 7ND

## Definitions.

**Employee** means any person, current or past, employed for wages or salary.

**Consultant** means a person, current or past, who joins Emeritus for contractual or assignment-based employment.

**Candidate** means a person who has applied for employment.

**Personal data** means any data related to an identified or identifiable living natural person, provided, however, that if an applicable law has a different definition of personal data (or a similar term referring to information relating to an individual), such definition shall be applied to the extent applicable.

**Sensitive personal data (SPD)** means Personal Data which is more significantly related to the notion of a reasonable expectation of privacy. However, data may be considered more or less sensitive depending on context or jurisdiction.

**Process and Processing** means (1) any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, accessing, consultation, interpretation, assessment, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction; and (2) any other action that may be taken with respect to Personal Data.

**(Data) Controller** means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data.

**(Data) Processor** means a natural or legal person (other than an employee of the controller), public authority, agency or other body which processes personal data on behalf of the controller.

**Adequacy decision** means a formal decision made by the European Union (EU) which recognises that another country, territory, sector or international organisation provides an equivalent level of protection for personal data as the EU does.

**Onward transfer** means a transfer of personal data to a fourth party or beyond. For instance, the first party is the data subject (you), the second party is the controller (Emeritus), the third party is the processor, and the fourth party is a sub-contractor of the processor.

**Personal data breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

**University partners** mean the universities on whose behalf we deliver and manage the respective educational courses.

**Annexure-1**  
**List of Affiliates**

Name	Jurisdiction	Organizational ID
Eruditus Learning Solutions Pte Ltd	Singapore	201230726W
Eruditus Executive Education FZ-LLC	UAE	91917
EIM Learning S.C.	Mexico	ELE2103084DA
Emeritus Institute of Management, Inc.	USA	6959273
Emeritus Institute of Management Pte. Ltd.	Singapore	201510637C
Erulearning Solutions Pvt. Ltd.	India	U80904MH2016PTC288248
Emeritus Enterprise, Inc.	USA	6595607
Emeritus Institute of Management DO Brasil Ltda	Brazil	46.284.205/0001-47
EIM Learning UK Ltd.	UK	11617490