



Prospective Employee Privacy Notice

VERSION 1.0



Privacy Notice

Upstox refers to RKSV Securities India Private Limited or Upstox Securities Private Limited or RKSV Commodities India Private Limited, its affiliates, associates Companies, subsidiaries or any Company formed under the group referred to hereafter as 'Company', 'we', 'us', or 'our', or Upstox is dedicated to respecting your privacy and preferences.

Upstox provides this Privacy Notice ("Notice") to inform you ("you/your") of our procedures regarding the collection and use of your Personal Information ("PI") that Upstox may collect and receive from you, in accordance with the Digital Personal Data Protection Act, 2023 ("DPDP") and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("Rules"). The term **PI**, as used herein, refers to 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, can identify such a person. This Notice applies to the PI (Personal Information) and SPI (Sensitive Personal Information) that you provide to us for the uses mentioned below.

Information Processed

Information includes, without limitation, the following categories of personal data/sensitive personal data that we may collect, receive, possess, store, use, deal with, handle, transfer, and otherwise process in accordance with applicable laws:

We collect information directly from you through your application, CV, interview notes, assessments, and references.

- **Data about you:** This may include, without limitation, your name, email address, phone number, address, educational details, skills, and KYC/identity documents (for example, Aadhaar and PAN).
- **Financial data:** This includes current compensation details.
- **Communications data:** This includes, without limitation, your preferences regarding receiving various job openings.

You are required to ensure that all the information you provide is accurate, current, and truthful. You will be held responsible for any errors, discrepancies, or inaccuracies in the information you share, unless the information has been verified through KYC processes as required by law and supported by documentary proof.

How we will use your personal data

Upstox would collect, receive, process, store, deal or handle the following PI from you for a number of different purposes:

1. Assessing your suitability for the role you applied for
2. To communicate with you about potential employment opportunities or provide you with relevant details regarding a role or contract
3. To confirm your identity to process your job application
4. Sending notifications about your application and its status
5. To schedule interviews
6. To perform background verification
7. To meet legal obligations

How we will share your personal data

You hereby understand that the above stated data elements and Personal Information shall be shared with different departments & other entities within the Upstox group and third-party service providers subject to suitable confidentiality obligations, and in accordance with contractual terms, applicable laws or where we have another valid legal basis for doing so.

You authorise Upstox to exchange, share, and disclose all information with our Affiliates & Third party service providers such as but not limited to recruitment agencies, background check providers, and professional advisors, only as necessary and under strict confidentiality. Upstox will not be held liable for the use or disclosure of this information

How we will keep your information safe

Upstox has implemented suitable technical, organisational, and security measures to protect your personal data from accidental loss, unauthorised use or access, alteration, or disclosure. Additionally, access to your personal data is restricted to employees of the HR department or department only on need to know basis, agents, contractors, and other third parties who need it for business purposes. They will process your personal data only according to the company's instructions and are bound by confidentiality obligations.

We also have procedures in place to address any suspected data security breaches and will notify employees and any relevant regulator if a breach occurs and if we are legally required to do so.

How long we will keep your information

If you are not selected for the role, we will retain your data for a period aligned with legal and company policy, after which it will be securely deleted. If selected for the role, your data will become part of your employee record and handled according to our employee data protection policies.

To establish the appropriate retention period for personal data, we evaluate factors such as the quantity, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process the data and whether these purposes can be achieved through other methods, and relevant legal requirements.

In certain cases, we may anonymise your personal data so that it can no longer be linked to you, allowing us to use that information without further notice to you

Right to Withdraw Consent

In certain cases, depending on your country of residence and if you have given consent for the collection, processing, and transfer of your personal data for a specific purpose, you may have the right to withdraw your consent at any time. To do so, please contact us through HR@upstox.com.

Once we receive your withdrawal notification, if the information is not processed we will cease processing your data for the purpose(s) you initially consented to, unless we have another legal basis to continue the processing

Communication and Changes to the Privacy Policy

Please note that this policy may change from time to time. If UPSTOX changes its policies and procedures, UPSTOX will post those changes on UPSTOX website to keep you/users aware of what information UPSTOX collects, how UPSTOX uses it and under what circumstances UPSTOX may disclose it. Changes to this Policy are effective when they are posted on this page. Please visit our website to keep yourself abreast of any changes to this policy.

How To Contact Us

If you have a privacy concern, complaint or a question regarding this privacy statement or would like to access your rights, please contact at HR@upstox.com
