

## Privacy Policy

### for personnel marketing and the application process at

### MHP India Private Limited (formerly known as Ruso IT Solutions Private Limited)

We, MHP India Private Limited, formerly known as Ruso IT Solutions Private Limited (the “**Company**” its subsidiaries, associates, and affiliated companies, also referred to as “**MHP India**”, “**MHP**”, “**us**”, “**we**”) through this “**Privacy Policy**” or “**Policy**”, inform you that your personal data as defined under Digital Personal Data Protection Act, 2023 (DPDPA), meaning any data by or in relation to which you may be identified (“**Personal Data**”), will be collected, used, stored, disclosed, protected, and processed in accordance with Applicable Data Protection Laws.

For the purposes of this Privacy Policy, “**Applicable Data Protection Laws**” means the Digital Personal Data Protection Act, 2023 (DPDPA) including the Digital Personal Data Protection Rules, 2025 (DPDP Rules) and other rules issued or notified thereunder and to the extent they remain in force, the procedural requirements under the Information Technology Act, 2000 and applicable rules thereunder. Except where the context otherwise requires, all capitalized terms used in this Privacy Policy shall have the meanings ascribed to them under the DPDPA and DPDP Rules, as notified and amended from time to time.

The following grievance officer has been appointed to manage any Personal Data-related concerns. The grievance will be resolved within 90 (ninety) days of the Company receiving its information.

Designation: Senior Manager – HR  
Email: [MHPDataPrivacyIndia@mhp.com](mailto:MHPDataPrivacyIndia@mhp.com)

If you have questions about this Privacy Policy or your Personal Data, contact at [MHPDataPrivacyIndia@mhp.com](mailto:MHPDataPrivacyIndia@mhp.com)

With this data protection declaration forming an integral part of this Policy, we inform you about the Processing of your Personal Data and about your data protection rights in the context of personnel marketing and applications at MHP. For the purposes of this Policy, “**Processing**” shall have the meaning as defined under the DPDPA and refers to any wholly or partly automated operation or set of operations performed on digital Personal Data including but not limited to collection, storage, use, sharing, and erasure of data. For information on the Processing of Personal Data in other areas, please refer to the respective specific privacy policy.

#### Applicability of this Policy

If we refer to this Privacy Policy from external social media profiles, the following explanations only apply insofar as the Processing takes place within the servers and technological infrastructure that belongs to us and all other transactions will be governed by the respective policies governing use of such respective external platform.

#### 1) What information does the Company collect and why

Personal Data may be collected throughout the recruitment process and subsequent engagement, from various sources, including directly from you when you apply online or via email or in person including when you use a scheduling tool for booking any interview appointment, referrals from your contacts professionally linked to MHP India, and from third-party entities like recruitment agencies and background screening providers, as well as publicly

#### **MHP India Private Limited** (Formerly known as Ruso IT Solutions Private Limited)

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accessible platforms such as professional networking platforms to the extent permitted by the Applicable Data Protection Laws and as more fully set out under Section 3 hereunder. In the context of recruitment, the following categories of Personal Data are generally collected and processed:

- a) Full name, residential and/or business address, personal and/or professional telephone number, personal and/or work email address, along with other relevant contact information.
- b) Information related to the competencies, skills, language proficiencies, professional background, and educational qualifications (as outlined in your CV or resume, including prior employment history, academic credentials, certifications, etc.), as well as references.
- c) Assessment data as required based on internal processes involving completion of assessments essential for evaluating the suitability for a specific position. In these instances, interview notes, written tests, and assessment results will be maintained.
- d) Preferences pertaining to the job opportunity, such as desired employment location and areas of professional interest to check the suitability for the specific role and its associated work location.
- e) User identification details, such as usernames and other such information used to verify your identity with our internal software tools/online platform.
- f) Other information, such as information found from public sources (which is excluded from the purview of Applicable Data Protection Laws) as well as information related to reference checks that may be carried out by us directly or indirectly, depending on the position you are applying for, and where deemed necessary for the recruitment activities.
- g) Additionally, once you are shortlisted, we may request further information such as identity proof, compensation expectations, current remunerations details, family details, and other relevant information.
- h) As part of the background screening, educational, employment, criminal record checks, judicial records check, and social media screening may be conducted only when and to the extent permitted by Applicable Data Protection Laws.
- i) In specific instances, we may collect your bank account information and supporting documentation, including receipts, to facilitate reimbursement of interview-related expenses, if applicable.
- j) In certain circumstances, we may request/receive information regarding your health, including any disability status/accessibility needs, to facilitate suitable arrangements for the interview process.
- k) We may request you to obtain a certificate from the local police station having jurisdiction certifying that there are no pending FIRs or charges registered against you.

## 2) Usage of Personal Data/Information:

The Company may collect, store, disclose, process and transfer your Personal Data/Information for various purposes including but not limited to the following ("**Intended Purposes**"):

- a) To enable the efficient functioning of Company's business;
- b) Processing of information in connection with your employment application/contract with the Company for the relevant job profile;
- c) To transfer information about the applicants/Employees if the Company is acquired by or merged with another company;

- d) To administer or otherwise carry out the Company's obligations for, or in relation to the job application with the Company including scheduling interviews and managing recruitment activities;
- e) To respond to subpoenas, court orders, or legal process, or to establish or exercise Company's legal rights or defend against legal claims; and
- f) To investigate, prevent, or take action regarding illegal activities, suspected fraud or as otherwise required by law.

### **3) Means through which Personal Data is collected**

MHP may obtain Personal Data from the applicants/Data Principal through any electronic or non-electronic means, either:

- Personally, from the applicant/Data Principal and if applicable, prior to, or during the recruitment process and if obtained physically, this Policy shall apply for digitized form of Personal Data, and
- Through job boards, resume databases, professional networking sites, and through the Company's internal Application Tracking System (ATS), and data enrichment tools.
- Indirectly, through third parties such as employee referral, recruitment agencies and labor exchange focused on business and employment and through any other third party which results necessary due to the relationship between the Data Principal and the Data Fiduciary.

### **4) Purposes of Personal Data Collection**

Below you will find an overview of the purposes and legal basis of Personal Data Processing in the context of personnel marketing and the online application process at MHP. This process is designed to be transparent and secure, enabling candidates to submit their applications and stay informed in the form of email or message updates. In all cases, we process Personal Data primarily in accordance with the Applicable Data Protection Laws, for the protection of Personal Data in possession of private parties and its regulation.

If an employment relationship is established with you, further data Processing is governed by the Privacy Policy for the employment relationship and/or the employment agreement/ definitive agreement with the Company (such agreement will govern data use thereafter).

For applicants/Data Principals, Processing is based on:

- a) Your Consent for use of your Personal Data for legitimate purposes (employment application/employment).
- b) Fulfilment of legal obligations.
- c) Other contractual necessities.

The provision of Personal Data by you may be required by Indian law or may be necessary for the conclusion of a contractual relationship. We will inform you separately if you are obliged to provide Personal Data and the possible consequences of not providing it (e.g. a loss of claims or our notification that we cannot provide the requested service without providing certain information). The use of the online offer is generally possible without registration. The use of individual services and functions may require prior registration. Even if you use our online services without registering, Personal Data may still be processed.

#### 4.1 Use of Personal Data for fulfilment of contractual and pre-contractual obligations

Your Personal Data is processed solely to support the recruitment process and, if relevant, to establish an employment relationship. The purposes include in particular

- Receiving, reviewing and storing your application.
- Managing recruitment, managing applications, interviews, internal workflow, and overall process. For internal applicants for internal programs: Application management and implementation of the selection process.
- Verifying qualifications and references.

#### 4.2 Further Processing for the purpose of fact check

We conduct a review of your Personal Data to ensure that potential employees are able to perform their duties without conflicts of interest and in compliance with high ethical standards and are committed to the Company's principles.

The verification of Personal Data includes your Personal Data (surname, first name, date of birth, address) and the presentation of your original identity card or a comparable document proving your identity, the presentation of your original certificates (in particular the last certificate of the highest level of education) or an officially certified copy thereof in paper form. We will also check whether you have already been employed by MHP and - limited to this case and in compliance with Applicable Data Protection Laws- whether any written disciplinary measures have been taken against you in the last three calendar years. For this purpose, Personal Data in the existing personnel file for the past three calendar years will be queried.

The fact check is carried out by the responsible HR department. Only a limited number of people are authorized to access your data internally. In the event of negative findings in the fact check, the results are discussed in a committee (specialist department, HR department). The result of the consultation is documented and filed in the personnel file.

For new hires at the Director, Senior Sales Director, Associated Partner, Executive Director and Partner levels, the completed fact check checklist, and the completed self-disclosure form are stored in the personnel file and remain there in accordance with the deletion period for relevant personnel documents and data. No other data storage or Processing takes place. The fact check checklist, and the self-disclosure form will be deleted from the personnel file after 4 (four) months for external candidates who are not hired and after three years for all other cases.

#### 4.3 Job Subscription (Newsletter)

MHP offers a newsletter in the name and style of "Job Abo". To subscribe to the "Job Abo" newsletter, all you need to do is enter your email address and state how often you would like to receive the "Job Abo" newsletter. Newsletters are only sent after you have registered. If the contents of the "Job Abo" newsletter are specifically described in the context of a registration, these are decisive for the scope of the Consent. In addition, the "Job Abo" newsletter contains information about your career opportunities at MHP and other Group Companies. For the purposes of this Privacy Policy, "**Group Company**" means any company that controls, is controlled by, or is under common control with us/Porsche AG, excluding our competitors. Here, "control/ controlled by" shall mean having over 50% voting power, appointing more than half the board/partners, or directing management/policies through contracts or otherwise.

Registration takes place by means of the so-called double opt-in procedure, i.e. after your registration you will receive an e-mail in which you will be asked to confirm your registration in order to prevent misuse of your e-mail address.

The registrations are logged by us in order to be able to prove the registration process and the Consent contained therein in accordance with the legal requirements. You can revoke your Consent to receive the "Job Abo" newsletter at any time, e.g. by unsubscribing from the newsletter. You will find an unsubscribe link to exercise this right at the end of each newsletter.

#### **4.4 Application account and appointment scheduling tool**

A registered application account allows you to send and manage your application to us or other Group Companies via the electronic application system or to monitor job offers.

We recommend that you update information on the said application account using your login credentials, enabling MHP and the other Group Companies to access your information as part of the internal processes.

If you would like to set up an application account, registration is required. Your registration details (username and password) are collected and processed when you register and log in.

The application account provides the option of setting up an applicant profile. You can use an online questionnaire to enter or upload your Personal Data (e.g. form of address, title, surname, first name, date of birth, place of birth, country of birth, nationality, address, telephone number, e-mail address), your qualifications (e.g. educational background, professional experience if applicable, language skills, IT skills), your application documents (e.g. letter of motivation, application documents) and other application information (e.g. desired salary if applicable, availability if applicable). Corresponding mandatory fields are marked in the online questionnaire.

This data is processed in accordance with the Applicable Data Protection Laws in order to create your application account with your applicant profile to carry out the respective application procedure and - if you have given your Consent - as part of the review of your application in the Porsche Group or the Talent Pool.

If you delete your application account, your user profile will also be deleted. With regard to the deletion of data relating to specific applications at MHP, the provisions under Section 10 of this Privacy Policy shall apply. With regards to, the deletion of data relating to specific applications at other Group Companies, the provisions of the corresponding Group Company's data protection notices shall apply.

For scheduling any interview/s with you in relation to your job application, MHP uses MS Bookings as a scheduling tool. To schedule an appointment using MS Bookings, you will be required to enter your first and last name, your email address and state your availabilities in the tool. Your details are collected and Processed when using this tool.

#### **4.5 Fulfilment of legal obligations**

The Personal Data is processed based on your Consent during the application process, scheduling appointments, supporting recruitment, employment assessments, and compliance with legal and regulatory obligations pertaining to data collection and use and thereafter, use of your Personal Data will be pursuant to a definitive agreement with MHP in case the application process converts to employment with MHP.

#### **4.6 Safeguarding legitimate interests**

Your Personal Data may be processed to protect legitimate interests of our organization or third parties, unless your individual rights and data protection interests take priority over such Processing activities:

- Operational reporting
- Implementation and optimization of personnel marketing and the recruitment process (implementation of personnel marketing consulting, applicant surveys and statistical evaluations)

When using the online services, technical details like your device type, operating system, access time, visit length, IP address, and referrer URL are recorded. This data is collected only for technical operation and to identify and rectify faults. This data is not being used for the purpose of drawing conclusions about your person.

#### **4.7 Change of purpose**

Insofar as we process your Personal Data for a purpose other than that for which the data was collected, we take into account the compatibility of the original and the now pursued purpose, the type of Personal Data, the possible consequences of further Processing for you and the guarantees for the protection of Personal Data and we will notify you about this and request your Consent and carry out such Processing activity only based on your free and specific Consent for additional purposes.

#### **4.8 Profiling**

We do not carry out automated decision-making or profiling. Profiling is only carried out to protect our legitimate interests as described above.

#### **4.9 Use of Sensitive Personal Data**

The purposes for which sensitive Personal Data is collected are, a) provide health insurance in favour of the Data Principal and/or their beneficiary on employment, and b) Know information related to health status (symptoms, illnesses, care).

#### **5) Access authorizations in the end device**

Some functions of our online offering require you to grant authorization to access your end device (e.g. access to location data). The granting of authorizations is voluntary. Such access will only be requested when strictly necessary for the application process, in compliance with Applicable Data Protection Laws regarding data minimization. However, if you wish to use the corresponding functions, it is necessary to grant the corresponding authorizations, as otherwise you will not be able to use these functions. The authorizations remain active as long as you have not reset them in your end device by deactivating the respective setting.

#### **6) Cookies and Comparable Technologies**

We inform you that when browsing our website, cookies are used to facilitate user's access and utilization of the sites, providing information that can be used to offer specific content, convenient for your interests and for other purposes such as security and account management functions, which may involve the tracking of personally identifiable information.

This information could be collected for MHP internal use, for example, to enhance the security of the website or web page, detect important market trends, monitor your behaviour while browsing MHP website and provide you with proper service.

If you do not wish cookies to be used in general, you can also prevent them from being stored by making the appropriate settings on your end device. You can delete stored cookies at any time in the system settings of your end device. Please note that blocking certain types of cookies may result in impaired use of our online services.

## **7) Integrated third-party services**

Insofar as we integrate services from other providers as part of our online offering to offer you certain content or functions (e.g. scheduling tool for booking appointments, playing videos or route planning) and we process Personal Data in the process, this is carried out in accordance with Applicable Data Protection Laws. This is because the data Processing is then necessary to implement the functions you have selected or to protect our legitimate interest in optimizing the functionality of the online offering. Insofar as cookies may be used in the context of these third-party services, please see section 6. Please also refer to the Privacy Policy of the respective provider with regard to the third-party services.

Services from other providers that we include or to which we refer are provided by the relevant third parties. The third-party services also include offers from other Porsche AG Group Companies and Porsche Centres. We have no influence on the content and function of the third-party services and are not responsible for the Processing of your Personal Data by their providers, unless the third-party services are designed entirely on our behalf and then integrated by us under our own responsibility. Insofar as the integration of a third-party service leads to us establishing joint processes with its provider, we will define with this provider in an agreement on joint responsibility establishing how the respective tasks and responsibilities for the Processing of Personal Data are structured and who fulfils which data protection obligations. If cookies are also to be set on the basis of your Consent, you will receive further information on the responsibility for setting these cookies or any associated third-party services in the corresponding areas of Consent management.

Unless otherwise stated, profiles on social media are only integrated into our online offering as a link to the corresponding third-party services. After clicking on the integrated text/image link, you will be redirected to the website of the respective social media provider. After forwarding, Personal Data may be collected directly by the third-party provider. If you are logged into your user account with the respective social media provider during this time, the provider may be able to assign the information collected from the specific visit to your personal user account. If you interact via a "Share" button of the respective social media provider, this information can be stored in the personal user account and possibly published. If you wish to prevent the information collected from being directly assigned to your user account, you must log out before clicking on the integrated text/image link.

## **8) Recipients of Personal Data**

Within our Company, only those persons have access to your Personal Data who need it for the purposes stated in each case. Your Personal Data will only be passed on to external recipients if we are legally authorized to do so or if we have your Consent. Below you will find an overview of the relevant recipients:

- Processors: Group Companies or external service providers. These processors are carefully selected and regularly checked by us to ensure that your privacy is protected. The service providers may only use the data for the purposes specified by us.

- Public authorities: Authorities and state institutions, such as tax authorities, law enforcement agencies or courts, to which we (have to) transfer Personal Data, e.g. to fulfil legal obligations or to protect legitimate interests.
- Private bodies: Group Companies [including Porsche dealers and service companies, cooperation partners, service providers (not bound by instructions) or authorized persons such as Porsche Centres and Porsche Service Centres, financing banks, credit agencies or transport service providers].

## 9) Data Sharing Transfer and referrals of Personal Data

The Personal Data/information collected may be shared with authorized data recipients in connection with recruitment and associated activities. These may include internal and external HR and recruitment teams, interview panel members, background verification agencies, travel and immigration vendors, and authorized third-party service providers, internal or external auditors, Government authorities (if applicable), and other recipients.

MHP India may transfer your Personal Data to other countries where the Company or its affiliates operate for business and administrative purposes. These transfers may include intra-group data sharing, access to centralized data centres, or sharing with third-party vendors, and are conducted solely for the purposes outlined in this notice. Personal data may be hosted in secure databases across jurisdictions and is accessible only to authorized personnel for business use. All such transfers are made in accordance with the Applicable Data Protection Laws, and MHP India ensures that appropriate data protection measures are undertaken.

## 10) Retention of Personal Data

The Personal Data/information will be retained if it is required to serve the purpose for which it was collected, primarily to allow us to contact you about potential future employment opportunities. Your Personal Data/information that is no longer required to be retained in accordance with the Applicable Data Protection Laws and business requirements will be disposed of in a secure manner. You can choose to opt out by writing to us at [MHPDataPrivacyIndia@mhp.com](mailto:MHPDataPrivacyIndia@mhp.com), for discontinuation of your data Processing activities. If no employment relationship is established, application data is anonymized after 4 (four) months from the date of application.

## 11) Consent

Your Personal Data is processed only with your Consent and for the specific purposes defined in this Policy. You may withdraw Consent anytime without affecting prior lawful Processing.

We delete the data if you have withdrawn your Consent and no other legal basis applies. If another legal basis applies, we will erase the data once that other legal basis no longer applies. You could always request the withdrawal of your Consent and could opt out of the Processing of your Personal Data for secondary purposes, such as inclusion in talent pools or receiving the "Job Abo" newsletter by sending an email to [MHP-HR-INDIA@mhp.com](mailto:MHP-HR-INDIA@mhp.com) or by selecting the appropriate option in our electronic forms.

## 12) Your Data Principal Rights

You can request for a summary of your Personal Data, and request to have your data corrected or amended to the extent it is found inaccurate or deficient. You can withdraw your Consent provided to us at any time by contacting us at [MHPDataPrivacyIndia@mhp.com](mailto:MHPDataPrivacyIndia@mhp.com)

## 13) Security Measures

The Company has adopted reasonable security practices and procedures to ensure that the Personal Data/Information collected is secure. The applicants/ Employees agree that such measures are secure and adequate. The Company restricts access to Personal Data/Information to its and its affiliates' Employees, agents, third party business associates who need to know such Personal Data/Information in relation to the Intended Purposes as specified above in this Policy.

While the Company will endeavour to take all reasonable and appropriate steps to keep secure any information which the Company holds about the applicants/Employees and prevent unauthorized access, the applicants/Employees acknowledge that such steps are never completely secure particularly in the context of the internet and that the Company cannot provide any absolute assurance regarding the security of Personal Data/Information. To the fullest extent permissible by applicable law, the Company disclaims any liability in relation to any breach of security or unintended loss or disclosure of information in relation to Personal Data/Information.

#### **14) Consent for the Processing of Personal Data**

MHP informs you that by submitting your Personal Data through the corresponding form, you acknowledge having read and understood the contents of this Privacy Policy. Your Personal Data, including any sensitive data, will be processed in accordance with the purposes described in this document.

#### **15) Amendments**

MHP may amend or restate, partially or entirely, this Privacy Policy at any time. The new version of the Policy will be posted through the publication via official channels of MHP and published in visible spaces within MHP facilities.

Updates will be effective on the day after the update is published.

For proper identification, each Policy will include the date in which it was last updated.

#### **16) Governing Law and Jurisdiction**

This Policy is governed by and construed in accordance with the laws of India and subject to jurisdiction of courts situated in Bangalore, Karnataka, India.

#### **17) Latest Version**

The latest version of this Privacy Policy applies. Status 2026\_03\_17.