



WM Global Technology Services India Private Limited (WMGTS) Associate Information Privacy Policy

SUMMARY

WM Global Technology Services India Private Limited and its affiliates (“Company” or “WMGTS”) recognizes the tremendous value of our associates. Therefore, we place great importance in managing your information (“Associate Information”) in accordance with our basic belief of respect for the individual. WMGTS is committed to complying with applicable privacy laws and regulations in the locations where we operate. This Associate Privacy Policy (“Policy”) explains how the Company collects, uses, manages, and shares your Associate Information. This Policy may be supplemented from time to time with more specific privacy notices.

“Associate Information” is the information that we use and collect about you when you are at work or using company-owned equipment. Associate Information includes the following:

- **“Personal Information”** - any information that relates to an associate, which, either directly or indirectly in combination with other information available or likely to be available to the Company, is capable of identifying an individual associate.
- **“Sensitive Personal Data or Information”** - such personal information which consists of information or details relating to:
 - Non-Company passwords
 - Financial information such as Bank account or credit card or debit card or other payment instrument details
 - Physical, physiological, and mental health condition
 - Sexual orientation
 - Medical records and history
 - Biometric information

SCOPE

This Policy applies to all our WMGTS Associates who have provided Personal Information and Sensitive Personal Information to the Company. Associate Information may be processed, used, stored, or shared for the purpose of your current or previous employment relationship with the Company. This Policy supplements and does not supersede existing policies. The Company reserves the right to change this Policy at any time.

PLEDGE OF ACCOUNTABILITY

WMGTS takes steps to ensure our associates and business partners manage Associate Information properly to maintain your trust. We expect associates and business partners that handle Associate



Information to take reasonable measures to maintain the confidentiality of your information and to do so in accordance with our policies and the law.

INFORMATION COLLECTION – What We Collect and How We Collect It

Information We Collect

We may collect the following categories of information for the purpose of employment relationship with the Company. Not all categories may be collected about every individual:

- Personal identifiers, such as name and address
- Device and online identifiers and related information, such as telephone number and email address
- Internet, application, and network activity, such as cookie IDs and browser visits
- Government identifiers, such as national identification numbers and driver's license numbers
- Demographic information, such as age and date of birth
- Financial information, such as bank account and routing numbers
- Health and health insurance information, such health insurance identification numbers including information related to dependents
- Characteristics of classifications, such as gender, disabilities, etc.
- Biometric information, such as imagery of the iris, retina, and fingerprints
- Location information, such as geo-location information
- Audio, visual, and other sensory information, such as audio and video recordings
- Past and present employment information, such as occupation, title, licenses, and professional memberships
- Background and criminal information, such as background checks and criminal convictions consistent with applicable law
- Education information, such as degree and schooling information
- Individual preferences and characteristics, such as information related to any assessment you may take as part of the interview screening process upon hire or during your tenure for promotional opportunities
- Personal and direct tax details, computation, and payments

From time to time, the Company may need to collect Sensitive Personal Information. To the extent the Company has a business need to specifically collect, use, and process your Sensitive Personal Information, we will seek your consent prior to such collection and/or processing.

How We Collect Associate Information

Information Collected from You: The Company may collect Associate Information directly from you as part of your employment. For example, information that you give us when you fill out an employment application or enroll in benefits programs, or it can be information that you give us when you interact with services such as **OneWalmart** (<https://one.walmart.com>). We may also collect photographs or audio/visual recordings on our premises, or during events and activities relating to your employment



with the Company. We may also collect Personal Information about associates' dependents for the purposes of providing employee benefits.

Information Collected Automatically: We collect information from you automatically when you use certain websites the Company operates for our associates, like **OneWalmart**. This information may not identify you directly. For example, we may collect IP address, browser or operating system information, and referring website. Our websites may use cookies, which are small text files stored on your computer that help us to maintain your session or provide other interactive features. You can turn off cookies through your browser. However, turning off cookies may limit some functionality of the site, such as changing the layout of your personalized content. The site may also use web beacons, which allow us to know if you visited a certain page. Additionally, we collect information from you when you use company equipment, systems, and applications. The Company advises its associates to use the Company-issued equipment exclusively for Company-related purposes and to abstain from saving Sensitive Personal Information on such Company-issued equipment. For more information and more detailed guidance on the use of Walmart systems, please refer to the "Additional Resources" section below. If you choose to include any of your Personal Information and/or Sensitive Personal Information on Company-issued equipment, you are authorizing and consenting to the collection and processing of that information.

Information Collected from Other Sources: We receive information about you from third party sources to assist us with employment-related activities, and other legal matters. For example, we may collect information from employment background agencies for the purpose of conducting a background check. Examples of the types of information contained in a background check may include your criminal, employment, and educational history, as well as information about your character, general reputation, personal characteristics, mode of living, credit standing, and more. Before requesting a background check, WMGTS will obtain your informed and specific consent.

USE OF ASSOCIATE INFORMATION

We will use your information for the following purposes:

- To fulfill requests and obligations related to your employment
- To create and maintain records related to your employment
- To conduct auditing and monitoring of transactions and engagement
- To protect the security and integrity of our systems, processes, and our business, and help prevent fraud
- To update our operational and technical functionality
- To conduct business analysis, such as analytics, projections, identifying areas for operational improvement
- To conduct research and development
- To fulfill our legal function or obligations and be compliant with applicable laws
- To conduct recruiting and for employment purposes



Employment Purposes: We will collect Associate Information about you or information about your dependents relating to your working relationship with WMGTS. We will use the information for employment purposes and in the context of our employment relationship with you, such as recruiting and hiring, enrolling you in benefits, administering payroll, and for evaluation and training purposes.

- **Recruiting and Hiring** – We use your information to consider your skills, qualifications, and interests in connection with our employment opportunities; to communicate with you and inform you of career opportunities; to conduct background checks if you are offered a job; to improve our recruiting and hiring process.
- **Benefits** – We will use your information to enroll you, deliver, and communicate with you about the various benefit plans we offer. The Company offers associates many different benefits and uses Associate Information in different ways depending on the type of benefit program.
- **Payroll** – We will use information you have provided, such as direct deposit or banking information, to administer payroll services.
- **Job Performance and Career Management** – We will use your information for the purposes of evaluating performance, managing job related training, building career-path development insights and tools, and optimizing job roles.
- **Legal Purposes** – We may use your information to prepare any legal claim or defense necessary to protect the interests of the Company, our associates, and our customers.
- **Investigative Purposes** – We may use your information to conduct investigations related to Company policies.

Monitoring and Protection:

- **Cameras:** To ensure the safety and security of our associates and assets, closed circuit television and cameras are used throughout WMGT facilities. These cameras are used for purposes such as safety and security, asset protection, operations improvement, and deterrence and investigation of misconduct. Cameras will only be used in areas where an individual has an expectation that the individual could be recorded.
- **Equipment and Systems:** We have a reasonable interest in ensuring that Company equipment and systems, as well as data, are protected and used properly. Accordingly, to the extent allowed by applicable law, we monitor or record any and all use of Company equipment and systems, including use for personal purposes.

For more information, including market-specific policies, see “Additional Resources.”

SHARING AND JOINT USE OF ASSOCIATE INFORMATION

Some of our computer systems, including our websites, are operated by our parent company Walmart Inc. in the United States or by other companies contracted to provide services to the Company that operate in countries outside India.

Sharing with the Walmart Business: Associate Information may be shared with our business teams or within our corporate family of companies, as permitted by law, when it is determined that there is a benefit for you or our business. Associate information must be managed and protected in accordance



with the Company's policies. In addition, the Company takes appropriate technical, organizational, and legal steps to protect your information, either within or outside of India. For example, access to information is granted on a need to know basis and is given only to persons who need relevant information to accomplish their properly assigned job responsibilities. Generally, all associates within the Company and the Walmart companies globally have access to business contact information such as names, positions, workplace telephone numbers, work addresses, and work email addresses.

Sharing with Service Providers: From time to time, we may utilize service providers to administer certain programs, benefits, or administrative functions on behalf of the Company. We require our service providers to keep your Associate Information confidential.

Sharing for Legal Requirements and Protection of Company and Others: We may share your information in other special circumstances, which include situations when sharing is required by law, or we believe sharing will help to protect the safety, property, or rights of the Company, our associates, or other persons. Examples include:

- Protecting the health or safety of associates
- Addressing crimes committed on Company property
- Identifying and addressing fraud or financial risk
- Providing information to law enforcement at their written request
- Responding to administrative, judicial, or other legal process, including responding to a search warrant or other valid legal inquiry
- When required by statute, regulation, or contract
- When necessary to lawfully investigate and protect a legal or business interest of the Company

In all cases, approval of the Legal and Governance team in the Company is required to guard against unauthorized disclosure or access.

SECURITY

The Company takes appropriate legal, organizational, and technical measures to protect Associate Information consistent with applicable privacy and data security laws. When the Company retains a third-party service provider, the Company requires the provider to use appropriate measures to protect the confidentiality and security of the information.

DATA INTEGRITY AND RETENTION

The Company takes reasonable steps to ensure that information is reliable for its intended use, accurate, and complete as necessary to carry out the purposes described in this Policy. The Company will retain Associate Information for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by law.

ASSOCIATE'S OBLIGATIONS

As a Company associate, you have a duty to keep your information up to date and to inform the Company of any significant changes. You also agree to inform your dependents whose Personal Information



and/or Sensitive Personal Information you may provide to the Company about the contents of this Policy.

As noted above, Company-issued equipment should be used exclusively for official work of the Company. It is recommended that associates should not use Company-issued equipment for personal use. Associates should not store Sensitive Personal Information on Company-issued equipment. If you store your Personal Information or Sensitive Personal Information on Company-issued equipment, then you are authorizing and consenting to the collection and processing of that information. Also, as noted above, for business functions, the Company may collect and process any information from Company-issued equipment at any time and without notice or consent, and you are consenting to such collection and processing of your Associate Information on Company-issued equipment.

As a Company associate, you agree to follow the Company's policies and procedures regarding the handling of any Personal Information and Sensitive Personal Information to which you have access during your relationship with the Company. In particular, you shall not use Company-issued equipment to access any such information for any purpose other than in connection with and to the extent necessary for your work with the Company. You understand that these obligations continue to exist after termination of your relationship with the Company. Breach of these obligations may result in disciplinary action, up to and including termination.

ACCESS AND CORRECTION REQUESTS, QUESTIONS AND COMPLAINTS

You have the right to request a copy of your Associate Information. Any request will be dealt with as required by applicable law. If such information is incorrect, inaccurate, or outdated, you may request that it be corrected or deleted. The Company will correct it within a reasonable period following such request.

As a Company associate, you also has the right to object to the collecting and processing of **your** Associate Information at any time on legitimate grounds, except where otherwise provided by applicable law. Please be aware that such an objection will not preclude the Company's ability to collect and/or process and/or otherwise obtain from you Company information that is not Associate Information.

QUESTIONS?

If you have any questions or requests in relation to the processing of information as described herein, please contact the Company's Legal & Governance team.

GRIEVANCE OFFICER

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below:



Name: **Ms. Ruby Sarwal, Director – Associate Relations**

Address: Building 10, 6th Floor, SEZ-Cessna Business Park, Kadubeesanahalli Village, Varthur Hobli, Outer Ring Road, Bangalore East Taluk, Bangalore – 560 087

Phone: **98992 73300**

Email: ruby.sarwal@walmart.com

Time: Monday – Friday (9:00 - 18:00)

ADDITIONAL RESOURCES

This Policy supplements and is in addition to other associate-facing Company policies, such as:

- [Mobile Handset Policy \(includes BYOD\)](#)
- [Social Media Policy](#)
- [Company Equipment Policy](#)
- [Background Checks Policy](#)
- [Walmart Information Policy](#)
- [Prevention of Discrimination and Harassment Policy](#)