



Employee and Job Candidate Privacy Notice (India)

EFFECTIVE DATE: MAY 6, 2026

1. About this Notice

Imagine Learning India Private Limited (“IL India”, “we”, “us”, “our”) is committed to processing your personal data in a lawful, transparent, and secure manner in accordance with the Digital Personal Data Protection Act, 2023 as amended (DPDP Act).

This notice explains the types of personal data we process, how and why we use it, how long we retain it, and your rights. This notice applies to all employees, workers and job candidates and does not form part of your contract of employment.

2. Data Fiduciary

Imagine Learning India Private Limited.

Unit Nos 509 and 510, Level 5, Wing D, Helios Business Park,

Agrahara Village, Varthur Hobli, Outer Ring Road,

Bangalore, Karnataka, India, 560103

Email: privacy@imaginelearning.com

3. Data Protection Commitments

We will process personal data lawfully, fairly, and transparently; collect only necessary data; ensure accuracy; retain data only as needed; and implement reasonable security safeguards.

4. Types of Data We Process

We may process demographic, identification data, professional or employment data, payroll data, government identifiers, job-related data, performance records, leave records, training data, and monitoring data.

For job candidates, this may also include recruitment-related data such as CVs, application materials, interview notes, assessment results, and references.

Sensitive personal data may include benefit information, diversity data, and criminal background data where permitted by law.

5. How We Collect Your Data

We collect data directly from you, from third parties such as recruitment agencies and background verification providers, and through company systems.

6. Purposes for Processing Data

The law on data protection allows us to process your personal data for the following purposes:

- to perform the employment contract that we are party to
- to carry out legally required duties
- to carry out our legitimate uses (as permitted under applicable law)
- to protect your interests
- where processing is necessary for employment-related purposes
- where we have obtained your consent



We collect and process your personal data to ensure that we can effectively manage the recruitment and employment relationship and comply with our legal obligations. This includes, but is not limited to:

- making decisions about recruitment, selection, appointments, promotions, and remuneration
- providing contractual benefits and administering payroll
- maintaining accurate and up-to-date personnel records
- communicating with you and your emergency contacts
- monitoring performance and conduct and managing disciplinary or capability procedures
- providing grievance procedures and handling complaints
- assessing training and development needs
- managing leave, including sickness absence and statutory leave
- making reasonable adjustments where required
- obtaining medical or other professional advice where necessary
- conducting employee engagement activities
- performing business planning and restructuring exercises
- dealing with legal claims and disputes
- preventing fraud and ensuring the security of our systems and infrastructure

7. Sharing Your Data

We may share data internally with relevant teams, including our parent and subsidiary companies, on a need-to-know basis. This includes, but is not limited to, your manager or supervisor, the HR department, legal and compliance teams, employees with operational responsibility for company systems, and the payroll function.

Your personal data may also be shared with third parties, such as our payroll providers, HR management systems, IT service providers, insurers, background verification agencies, bankers, auditors, consultants, and other professional advisors. Where these third parties act as service providers, they process your personal data on our behalf and in accordance with our instructions.

We may also share your personal data with third parties where required to comply with a legal obligation, or in connection with a business restructuring, sale, or reorganization.

8. Cross-Border Data Transfers

Your personal data may be transferred outside India, including to the United States and United Kingdom, with appropriate safeguards in place.

9. Data Security

We are committed to protecting the confidentiality, integrity, and security of your personal data.

We have implemented appropriate technical and organizational measures and processes to safeguard your personal data and to prevent its accidental loss, unauthorized access, use, alteration, or disclosure.

We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator where we are legally required to do so.



10. Data Retention

In line with data protection principles, we will only retain your personal data for as long as is necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Your personal data will generally be retained for the duration of your employment with us. In some cases, we may retain your personal data for a period after your employment has ended where this is necessary to comply with legal obligations, resolve disputes, enforce our agreements, or for other legitimate business purposes.

When your personal data is no longer required, we will ensure that it is securely deleted or anonymized in accordance with our data retention practices.

For job candidates who are not hired, we will retain personal data for a limited period as permitted by applicable law for recruitment and record-keeping purposes.

11. Your Rights

In The law on data protection gives you certain rights in relation to the personal data we hold about you. These include:

- Right to be informed – You have the right to be informed about how your personal data is processed. This notice forms part of that information.
- Right to access information – You have the right to request details of the personal data we hold about you, including how it is being used and with whom it has been shared.
- Right to correction and erasure – You have the right to request correction of inaccurate or incomplete personal data. You may also request the deletion of personal data where it is no longer necessary for the purpose for which it was collected.
- Right to grievance redressal – You have the right to raise concerns or complaints regarding the processing of your personal data with us.
- Right to nominate – You have the right to nominate another individual to exercise your rights in the event of your death or incapacity.
- Right to withdraw consent – In circumstances where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time.

Please note that some of these rights may be subject to limitations where we are required to retain or process your personal data to comply with legal obligations or for legitimate business purposes.

If you wish to exercise any of these rights, please contact us at:
privacy@imaginelearning.com

12. Grievance Redressal

Contact: privacy@imaginelearning.com

Unresolved issues may be escalated to the Data Protection Board of India.

13. Automated Decision-Making

We do not make decisions that significantly affect you based solely on automated processing.

14. Changes to this Notice

We may update this notice from time to time.