



AMS Privacy Statement - India

Effective Date: 1 November 2024

Last Updated: May 2026

At AMS, we are committed to ensuring the privacy and protection of the personal data we collect, process, and store during the recruitment process. This Privacy Statement explains how we collect, use, disclose, store, and otherwise process personal data relating to job applicants and prospective candidates. It also explains how we collect, use, and protect your personal data in compliance with the Digital Personal Data Protection Act, 2023 (DPDPA), and other applicable Indian laws.

By submitting your personal data to AMS or continuing to engage with our recruitment services, you acknowledge that you have read and understood this Privacy Statement, including the DPDPA read with the Digital Personal Data Protection Rules 2025 (DPDP Rules).

For the purposes of the DPDPA, AMS acts as a **Data Fiduciary** when determining the purpose and means of processing personal data. AMS may also act as a **Data Processor** when processing personal data on behalf of its clients, in which case the client shall be the Data Fiduciary.

Data We Collect

At AMS, we collect and process personal data when you apply for a role, register for our services, participate in recruitment activities, or when we receive your details through job portals, professional networks, employee referrals, or recruitment events where you have expressed interest in employment opportunities.

We may also collect personal data that is publicly available or made available by you in the public domain, including professional networking platforms, which shall constitute deemed consent under Section 7(6) of the DPDPA.

This data includes:

Personal Identification Information: Name, contact details (address, phone number, email address), date of birth, gender, nationality, government-issued IDs (e.g., passport, Aadhaar, driver's license, PAN card), work authorisation status, ethnicity, health information (vaccination status), disability status, photographs and any other personal data you voluntarily provide during the recruitment process.

Employment Information: CVs/resumes, cover letters, job history, references, salary expectations, educational qualifications, skills, competencies, certifications, job preferences, and availability.



References and Background Checks: Information provided by referees and outcomes of role-relevant checks (e.g., education or employment verification), conducted where permitted and, where required, with consent or in compliance with applicable law.

Technical and Usage Information: IP address, device information, browser details, cookies, tracking technologies, and usage data when you interact with AMS websites, recruitment platforms, or digital tools. AMS may use cookies and similar technologies to enhance your experience and for analytical purposes; by continuing to use our platforms, you consent to such use.

How We Use Your Data (Purposes of Processing)

AMS processes personal data only for specific, legitimate recruitment-related purposes, including:

Recruitment and Placement: To facilitate the recruitment process by matching you with suitable job opportunities based on your qualifications, experience, and preferences.

Communication: To contact you regarding job opportunities, schedule interviews, provide updates on your application status, and share feedback.

Client Matching: To share relevant candidate profiles with prospective employers or clients for potential employment opportunities.

Legal and Compliance: To comply with applicable legal and regulatory requirements, including equal opportunity employment laws, anti-discrimination regulations, and workplace safety regulations.

Improvement and Analytics: To analyse data (including through automated tools and artificial intelligence, where appropriate) to improve our recruitment services, enhance candidate experience, refine recruitment strategies, and develop workforce insights. Such analysis may involve profiling to assess candidate suitability but shall not form the sole basis of any decision producing legal effects without appropriate human oversight.

Record Keeping and Audit: To maintain records of processing activities and respond to audits, inspections, or regulatory inquiries as required under the DPDPA, the DPDP Rules, and any other applicable law.

Legal Basis for Processing

AMS processes personal data primarily for employment-related purposes recognised as legitimate uses under applicable law. Withdrawal of consent will not affect processing conducted under legitimate uses permitted by law. AMS shall rely on the most appropriate legal basis for each processing activity, and where multiple bases apply, the availability of an alternative basis shall not be affected by the withdrawal of consent.

Consent of the Data Principal: Where required, we rely on your consent, obtained through clear affirmative action, to process your personal data, particularly when you submit a job application, register as a candidate,



share your profile with clients, or undergo background checks. Consent may be given through electronic means, including through a Consent Manager registered with the Data Protection Board.

Certain Legitimate Uses (Section 7, DPDPA): AMS may process personal data without consent where necessary for its legitimate interests in operating its recruitment business and placing candidates in suitable roles, as permitted by law, including for the prevention, detection, investigation, or prosecution of offences or unlawful activity, where applicable.

Legal Obligation: AMS may process personal data to comply with obligations under applicable law including employment law, tax obligations, anti-money laundering regulations, and reporting to regulatory authorities. Such processing shall continue notwithstanding any withdrawal of consent.

Performance of a Contract: Data processing may be necessary for fulfilling our contractual obligations with you, such as providing recruitment services.

Data Sharing

AMS may share your personal data only where necessary for the purposes described in this Privacy Statement. AMS shall ensure that recipients are subject to appropriate contractual or legal obligations to protect the confidentiality and security of your personal data.

Personal data may be shared with the following categories of recipients: **AMS group entities:** For internal recruitment administration and operational support.

Employers/Clients: With prospective employers or clients for the purpose of job placement, including sharing relevant information such as CVs, qualifications, work experience, and references.

Third-Party Service Providers: AMS may engage third-party service providers acting as Data Processors under Section 8 of the DPDPA for background checks, psychometric testing, IT infrastructure providers, cloud services, payroll processing, or other recruitment-related services. All Data Processors are contractually required to process personal data only on AMS's documented instructions and to implement reasonable security safeguards.

Regulatory and Legal Authorities: AMS may disclose personal data to governmental or regulatory bodies if required by law, in response to legal requests, or to protect its legal rights.

Corporate Transactions: In the event of a merger, acquisition, restructuring, divestiture, or sale of all or part of the company, personal data may be transferred as part of the transaction. AMS shall use reasonable efforts to ensure that the transferee agrees to be bound by the terms of this Privacy Statement or provides equivalent protections.



Data Security Safeguards

AMS implements reasonable security safeguards and organisational measures, proportionate to the nature, scope, and volume of the personal data processed, to protect personal data against personal data breaches, including unauthorised access, use, disclosure, alteration, or destruction.

These safeguards include, but are not limited to:

Encryption: Sensitive personal data is encrypted in transit and at rest.

Access Controls: Access to personal data is limited to authorised personnel on a need-to-know basis, with appropriate authentication measures and system activity monitoring in place.

Incident Response: AMS maintains processes and procedures to detect, respond to, and recover from cybersecurity incidents, data breaches, or operational disruptions. These measures are periodically tested and reviewed.

Data Principals will be informed of personal data breaches as required by applicable law.

Personal Data Breaches: In the event of a personal data breach, AMS shall notify the Data Protection Board of India in the manner and within the time prescribed under Section 8(6) of the DPDP Act and Rule 6 of the DPDP Rules, 2025.

Data Retention

AMS retains personal data for no longer than is necessary to fulfil the purposes set out in this Privacy Statement, unless a longer retention period is required or permitted by applicable law. Retention periods are determined with reference to the nature of the data, the purpose of processing, and applicable legal requirements.

The retention of personal data may include:

Active Recruitment: AMS retains personal data for the duration of your active participation in the recruitment process and while you continue to engage with AMS's recruitment services.

Talent Pool: If you explicitly consent to be considered for future opportunities, AMS will retain your profile for a period determined by AMS from the date of your last interaction, unless you withdraw your consent earlier.

Inactive Accounts: Personal data may be archived, anonymised, or securely deleted after a period of inactivity in accordance with AMS policies. You may request erasure of your information, subject to identity verification and any legal obligations requiring continued retention.

Legal and Regulatory Obligations: Certain personal data may be retained beyond your engagement with AMS where required to comply with legal, tax, or regulatory requirements. Such retention will be in accordance with applicable statutory limitation periods or regulatory retention schedules.



Where AMS acts as a Data Processor on behalf of a client, retention periods may be determined in accordance with the client's instructions or applicable contractual obligations. Where litigation, an audit, or an investigation is reasonably anticipated or underway, AMS may suspend deletion/erasure in accordance with a legal hold.

Where appropriate, AMS securely deletes, erases, or anonymises personal data at the end of the applicable retention period using industry-standard methods. Once anonymised, the data no longer constitutes personal data under the DPDPA and may be retained indefinitely for analytical or statistical purposes.

Your Data Privacy Rights

Subject to applicable exceptions and limitations under the DPDPA and DPDP Rules, you have the following rights concerning your personal data:

Right to Access Information: You have the right to obtain information about the personal data being processed, the related processing activities, and the identities of the Data Fiduciaries and Data Processors with whom it is shared.

Right to Correction and Erasure: You have the right to request correction of inaccurate or incomplete data and erasure of data that is no longer necessary for the purpose for which it was collected, subject to AMS's right to retain personal data where required for legal compliance, contractual obligations, or the exercise or defence of legal claims.

Right to Withdraw Consent: You have the right to withdraw your consent at any time.

Right to Grievance Redressal: You have the right to lodge a grievance and to have it addressed within a defined timeframe. AMS shall provide an accessible grievance redressal mechanism.

Right to Nominate: You have the right to nominate another individual to exercise your rights on your behalf in the event of death or incapacity.

Right to Complain to the Data Protection Board: If you believe that AMS has processed your personal data in contravention of the DPDPA, you have the right to file a complaint with the Data Protection Board of India, after first exhausting the grievance redressal mechanism made available by AMS.

To exercise any of these rights, please submit a request using our individual rights online request form [here](#).

AMS may require you to verify your identity before processing any request and reserves the right to refuse requests that are manifestly unfounded, excessive, or repetitive.

Duties of the Data Principal



In accordance with Section 15 of the DPDPA, as a Data Principal, you have the following duties: (a) you shall not register a false or frivolous grievance or complaint with AMS or the Data Protection Board of India; (b) you shall not furnish any false particulars, suppress any material information, or impersonate another person when providing personal data; (c) you shall comply with applicable laws while exercising your rights under the DPDPA. AMS reserves the right to decline processing or terminate services where a Data Principal is found to have breached these duties.

Limitation of Liability

To the maximum extent permitted by applicable law, AMS shall not be liable for any indirect, incidental, consequential, or punitive damages arising out of or in connection with the processing of your personal data, including but not limited to loss of data, loss of opportunity, or any claim by a third party. AMS's total aggregate liability under or in connection with this Privacy Statement shall not exceed the amount prescribed under the DPDPA and the rules made thereunder. Nothing in this Privacy Statement shall exclude or limit liability that cannot be excluded or limited under applicable law.

International Transfers

AMS may transfer your personal data outside India only where permitted under Section 16 of the DPDPA and the DPDP Rules, 2025. Such transfers may be made only to countries or territories notified by the Central Government and in accordance with any applicable terms and conditions. AMS will apply appropriate safeguards to these transfers, including Standard Contractual Clauses (SCCs), intra-group data transfer agreements, or equivalent contractual protections. Transfers to countries or territories that are not notified, or that the Central Government has expressly restricted, are prohibited.

Changes to this Privacy Statement

We may update this Privacy Statement from time to time to reflect changes in legal requirements, our data handling practices, or the services we offer. AMS reserves the right to modify this Privacy Statement at its discretion. Any material changes will be communicated to you through reasonable means, including by email, notifications on our recruitment platforms, or our website. You are advised to visit our website regularly to stay informed about this Privacy Statement. Your continued engagement with AMS's recruitment services after such notification constitutes acceptance of the updated Privacy Statement.

Contact Us

The AMS Privacy Office is managed on a global basis. If you have any questions or require clarification, please contact dataprotection@weareams.com