



The Conduent Group of Companies – Personal Information Management Disclosure Notice for Applicants and Candidates for Employment

Conduent Business Services, LLC and its affiliates (“Conduent”, “we”, “us”, “our”), understands that your privacy is important to you. Conduent affiliates listed at the end of this Notice may process your personal data in their capacity as controllers and/or processors. We are committed to respecting your privacy and protecting your personal data. This Recruitment Privacy Notice (“Notice”) describes how we handle and protect your personal data in connection with our recruiting processes and programs.

This Notice only applies to the personal data of job applicants, potential candidates for employment, and our optional recruiting programs and events. It does not apply to our employees, independent contractors who do not individually apply or are submitted for direct workforce staffing augmentation, our clients, or other personal data that Conduent collects for other purposes.

As used in this Notice, “personal data” or “personal information” (used interchangeably) means information that either alone, or when combined with other data, identifies job applicants and potential candidates for employment, internship, volunteering, or direct contingent working with us, submitted as part of an application to work with us, collected as part of our recruiting efforts, and/or otherwise received by us for purposes of direct employment or working relationship with us (such as receiving from professional recruiting or staffing firms).

We will process your personal data in accordance with this Privacy Notice, unless such processing conflicts with the requirements of applicable law, in which case, applicable law will prevail.

By submitting your personal data to us, you acknowledge that:

- You have reviewed this Notice and agree to our use of your personal data in accordance with this Notice.
- Your personal data may be transferred and processed for the purposes and in the manner specified in this Notice, including transfer to countries that may not be deemed to provide the same level of data protection as your home country.
- You are not required to provide any requested information to us, but failing to provide specific information may result in your not being able to apply or continue your candidacy with us.
- This Notice does not form part of any contract of employment offered to candidates hired by Conduent.
- You have provided appropriate notices and obtained any consents needed to provide the personal data of others, if you submit candidate personal data to us.

Personal information we collect

If you apply for a specific position or positions, the types of personal data that we request from you, or may have to collect by law, are determined by the requirements of the country in which the position is located, and not necessarily the country in which you reside. Should you apply to more than one location or should the role to which you apply be available in more than one country, the types of personal data we request from you and the ways that we process it are determined by the requirements of all the countries in which the position is located.

We usually collect personal data directly from you when you apply for a role with us, such as your name, address, contact information, work and educational history, achievements, test results, references, employer feedback, and other general information relevant to your candidacy and the roles you may seek. It is possible we may collect personal information about you submitted to us by others, such as if you use a recruiting service or a social media platform and publicize your personal data in a manner to invite our using it to contact you for potential application for employment with us.

Some personal information we collect, use, safeguard and disclose is more sensitive and in some areas of the world this data may be referred to as “special categories” of data. As used in this Notice, *Sensitive Personal Information* is personal information that contains, reveals, and/or is combined with any of the following:

- unique governmental identifiers such as passport number, social security or social insurance number, taxpayer identification number, alien registration number, driver’s license number, national or state identification number/code or similar codes from any governmental entity around the world;
- personal financial account numbers, including credit/debit card numbers and/or any security code, authentication codes, access codes, expiration dates, or passwords that might identify, or permit access to, a person’s personal financial account;
- passwords, PINs, or other access codes for computers, electronic devices, financial accounts, online accounts or services;
- medical information or health status including information regarding an individual’s medical treatment, mental or physical condition, payment for medical diagnosis or treatment, or diagnosis by a health care professional;
- insurance or disability information including medical insurance identification numbers, claims and any claims history;
- biometric data, such as facial features, fingerprints, or retinal images;
- credit scores and other credit worthiness information (including credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living);
- information relating to sex life, sexual behavior or sexual orientation;
- racial or ethnic background;
- political opinions, philosophical beliefs, or religious beliefs;
- trade union membership;
- information from background checks;
- information relating to actual or alleged criminal history;
- genetic information; or
- any other information that according to its content and/or under the context of processing could reasonably cause significant embarrassment or harm to an individual if subject to unauthorized processing or disclosure, including any information which the person or entity providing such information advises should be considered as sensitive when providing it, and such other information to be treated as sensitive as required by locally applicable law.

We collect, use, safeguard and disclose Sensitive Personal Information only where, when, and how prescribed for the specific purposes required by applicable law for which it must be used, and only for the purposes of determining whether to enter into an employment or contracting relationship with you. Unless otherwise required or allowed by applicable law, we will only process Sensitive Personal Information with your express consent. We do not seek to obtain and will not collect Sensitive Personal Information about a candidate unless permitted to do so by applicable laws. We may have to request this type of information, for example, if we are recruiting you for work in a country where we must comply with anti-discrimination laws, or if we need to screen candidates for criminal backgrounds, language skills, professional licensing status, or other specific requirements related to the role for which you are applying.

Use of your personal information

We collect and use your personal data for legitimate human resources and business management reasons including:

- identifying and evaluating candidates for potential employment, as well as for future roles that may become available;
- recordkeeping in relation to recruiting and hiring;
- ensuring compliance with legal requirements, including diversity and inclusion requirements and practices;
- conducting criminal history checks as permitted by applicable law;
- protecting our legal rights to the extent authorized or permitted by law; or

- emergency situations where the health or safety of one or more individuals may be endangered.

We may also analyze your personal data or aggregated, pseudonymized, and/or de-identified data to improve our recruitment and hiring process and enhance our ability to attract successful candidates.

We may desire to retain your personal data to consider you for future employment opportunities. In such an event, we will seek your consent, either prior to or after you formally apply for a job opportunity, to be part of one of our recruiting programs that provides you ways to further learn about Conduent. These recruiting programs are entirely optional.

If you join a recruiting program, but subsequently wish to withdraw, please contact us as described in the ***How to Contact Us*** section of this Notice.

How we disclose your personal information and international transfers

Your personal data may be accessed by recruiters and interviewers working in the country where the position for which you are applying is based, as well as by recruiters and interviewers working in different countries within the Conduent group of global companies. Individuals performing administrative functions and information technology personnel within Conduent may also have access to your personal information in order to perform their jobs. We also use third party service providers who may help us process your personal information, such as application providers for recruiting software systems, applicant tracking systems, and information technology communication systems (such as email platform providers and online video interviewing service providers). We also share your personal data with other third party service providers that may assist us in recruiting talent, administering and evaluating pre-employment screening and testing (which may include aptitude tests or online or phone interviews, and to improve our recruiting practices). We maintain processes designed to ensure that any processing of personal data by third party service providers is consistent with this Privacy Notice, and the confidentiality, availability, and integrity of your personal data is appropriately protected.

It is possible your personal information may also be disclosed to successor or potential successor entities and financial and legal in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

We may be required to disclose certain personal information to other third parties: (i) as required by law; (ii) to protect our legal rights to the extent authorized or permitted by law; or (iii) in an emergency where the health or safety of a candidate or other individual may be endangered.

As a global company we may need to transfer your personal information so that it is accessible and available to people who work for Conduent affiliates and to third-parties who are located in countries different from the country in which you are located. Some of these countries may not be deemed to provide the same level of protections for your personal information as the country in which you are located or from which your personal information was originally collected. When such transfers are made or contemplated, we will take steps designed to ensure that such personal information is transferred only in accordance with applicable laws.

If we need to make such transfers, whether to a Conduent affiliated company or to a third-party, we will take steps designed to ensure that the recipient of access to that personal information has effective information security, privacy, and contractual controls in place designed to adequately protect the information. Where, and as, applicable before transferring your personal information, we will take steps designed to ensure one, or more, of the following: (i) the recipient is located in a country found to have a data protection legal framework providing adequate protection; (ii) the recipient is Privacy Shield certified; (iii) we shall enter into appropriate approved contractual clauses allowing the transfer; (iv) we have binding corporate rules in effect with the recipient for the type of data and use involved in the transfer; (v) we have your specific consent (where required by applicable law for the type of data); (vi) we are making the transfer under another legally allowed purpose under applicable laws which may include entering into or performing a contractual obligation in your interest, for important reasons of public interest, for legal claims or to defend legal interests, to protect your vital interests or those of your beneficiaries when you, or they, are unable to provide consent and, otherwise as required by recognized international legal requirements.

Unless you are otherwise notified and asked for specific consent concerning a specific transfer, Conduent will not transfer your personal information outside of the country where you are located if the recipient of that information will not take reasonable steps to protect your personal information in accordance with the privacy requirements of the country in which you are located, unless we are otherwise required and allowed to do so by applicable law.

Data retention

If you accept an offer of employment by us, any relevant personal data collected during your pre-employment period may become part of your personnel records and will be retained in accordance with specific legal requirements applicable in the country of your employment. If we do not employ you, we may nevertheless continue to retain and use your personal data for a period of time (which may vary depending on the country from which you apply and/or where you seek employment) for legal, regulatory, and corporate compliance, to defend claims, to analyze our talent acquisition practices, outcomes, and effectiveness, and to consider you for potential future roles depending upon your preferences and the location(s) where you seek employment. If you elect to join a recruiting program, we may retain your personal data to consider you for future employment opportunities.

If not selected for a position with Conduent, we will store your personal information for a period of time as required by applicable law and our required internal compliance purposes as allowed or required by applicable law. If not otherwise required to store your personal information for such purposes, and if you do not consent to join our talent pool for later consideration for positions, we will generally delete or de-identify your personal information used for your application or candidacy within 36 months after the time period for which we are required to store it for compliance purposes, unless earlier required by applicable law.

Security

We use technical, organizational, and physical measures designed to protect the integrity, confidentiality, security, and availability of personal data. Among other measures, only authorized personnel of Conduent and of our third party service providers with a legitimate need to know are provided access to personal data, and these employees and third party service providers are required to treat this information as confidential where applicable. Despite these precautions, we cannot guarantee that unauthorized persons will not obtain access to your personal data.

Your rights

We take reasonable steps that are designed to keep your personal data accurate, complete, and up-to-date for the purposes for which it is collected and used. We also have implemented measures that are designed to ensure that our processing of your personal data complies with this Privacy Notice and applicable law.

Depending upon applicable law, you may have the right to request access to the personal data that we have collected about you for the purposes of reviewing, requesting amendments, or requesting deletion of the data. You may have the right to request a copy of the personal data we have collected about you.

Should you have any questions or comments about our processing of your personal information, please contact the Data Protection Officer(s) for the region in which you are working, which is set forth in the **How to Contact Us** section of this Notice.

We seek to comply with all rights granted to data subjects under the relevant and applicable laws. Depending upon your location and the laws applicable to the processing of your personal information, you may have certain rights. To the extent required by applicable law, we shall comply with the following:

1. If you wish to access, correct, or update your personal information please first try to do so using any self-service applications to which you have been granted access. Please log into those applications and update your information as appropriate in accordance with the instructions corresponding to that application.
2. If you do not already have access to your personal information and you wish to receive access or copies of that information; or, if you wish to delete any such information and cannot do so through the self-service applications,

please contact the appropriate contact groups as stated in the **How to Contact Us** section of this Notice. If you do not receive appropriate action through those steps, you may contact the Data Protection Officer(s) appointed for the region from which you applied, or governing the office where you sought employment. For a listing of the DPO for those regions, please see the **How to Contact Us** section of this Notice. If you do not receive an acceptable response from the regional DPO, please contact the Conduent Chief Privacy Officer, also listed in the **How to Contact Us** section of this Notice. If you are a resident of a country giving you a right to obtain access personal information about you, we shall take reasonable efforts to respond to your request in accordance with applicable law, which may include providing you with information in a reasonably useable format.

3. If you are a resident of a country that provides you with the right to object to processing of your personal information, you can object to such processing and ask us to restrict processing of your personal information. Please note, that we may still have independent legal compliance obligations to retain some, or all, of your personal information for such time periods as required by law or internal compliance.
4. If we have collected and process your personal information based upon your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
5. If you are a resident of a country that provides you with the right, you have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries can be obtained by contacting the DPO for your region and/or the Conduent Chief Privacy Officer).

To help protect your privacy and security, we will take reasonable steps to verify your identity before granting you access to your personal data. We will make reasonable attempts to promptly investigate, comply with, or otherwise respond to your requests as may be required by applicable law. Depending upon the circumstances and the request, we may not be permitted to provide access to personal data or otherwise fully comply with your request; for example, where producing your information may reveal the identity of someone else. We reserve the right to charge an appropriate fee for complying with your request where allowed by applicable law, and/or to deny your requests where, in our discretion, they may be unfounded, excessive, or otherwise unacceptable under applicable law.

We do not make recruiting or hiring decisions based solely on automated decision-making or profiling without human intervention.

Your California Privacy Rights

Conduent does not share your personal data obtained for recruiting purposes for the purpose of third-party direct marketing.

If you are a California resident under the age of 18, and a registered user of any sites where this Privacy Notice is posted, California Business and Professions Code Section 22581 permits you to request and obtain the removal of content or information you have publicly posted, if the site allows public postings. To make such a request please send an email to the How to Contact Us section for subject access rights requests. To make such a request, please provide a detailed description of the specific content or information for which you seek removal. Please note such a request may not ensure complete or comprehensive removal of the

content you may have posted and that there may be circumstances where the law does not require or allow removal even if requested.

Cookies and other tracking technologies

We may use cookies and other tracking technologies in our talent recruiting activities, such as potentially to provide individuals with a customized online experience and in certain areas and under certain conditions to find and source candidates or to re-target applicants, potential applicants, or to invite prior employees to return to work with us.

We, or other network affiliates, may use cookies, web beacons, pixels, clear GIFS, scripts, or other similar technologies (“Tracking Technologies”) which may be stored on and accessed from your devices which may be loaded or read from certain websites, apps, or services that we may use for recruiting potential applicants. If you visit a website or use a service that uses Tracking Technologies, that website, app, or service will provide further information about the Tracking Technologies used and your choices with respect to it, and the website, app, or service will provide disclosure notices as required by applicable law or deemed necessary by Conduent and/or network operators with whom we may have a relationship concerning such Tracking Technologies.

If we use Tracking Technologies on a site or service, we will provide appropriate notice and give you an opportunity to opt-out from our, and network operators with whom we have a relationship, using such Tracking Technologies to track you across sites, services, devices, and over time.

We take reasonable steps designed to honor do not track signals from browsers in which it is clear that you have affirmatively set your browser to send a do not track signal.

Children

None of our recruiting activities are directed to children under the age of 16, unless otherwise allowed under applicable law. Unless authorized under applicable law, we make every effort to not collect personal data of people under the age of 16, and we do not intentionally collect such data. Unless otherwise allowed by applicable law, no one under the age of 16 is invited or authorized to use our sites, services, or submit information to Conduent for recruiting purposes.

External recruiters and third-party submissions

If otherwise allowed, all external recruiters or other third-parties who may submit applicant personal data to us for recruiting purposes must advise the applicant whose information will be submitted of our privacy practices and obtain any necessary consents prior to submitting such personal information. External recruiters and third-parties submitting such applicant data represent that they have obtained all proper consents from the individual whose information is being submitted to allow us to use the personal data for the purposes submitted.

How to Contact Us

Should you have any questions or comments about this Notice, our recruiting personal information processing practices, or if you wish to exercise any rights or requests with respect to your personal information, please contact the following contacts. You may always contact the DPO for the region applicable to your work.

If you wish to request access to, correct, update your personal information, or if you wish to object to processing of your information or request deletion or blocking of your personal information and you cannot gain access through self-service systems, please submit your request specifying the nature of your request (access, correction, deletion, etc.), and any specifics that might help us respond to your request to the mailboxes as follows:

If you live or are seeking work anywhere in Central, South America, or the Caribbean: DSRHRLATAM@Conduent.com

If you live or are seeking work in the United States or Canada: DSRHRNA@Conduent.com

If you live or are seeking work in the Asia – Pacific region: DSRHRAPAC@Conduent.com

If you live or are seeking work in Europe, Middle East or Africa: DSRHREMEA@Conduent.com

If you have any questions or comments about this Notice or Conduent’s applicant personal information handling practices, and for any other reasons concerning applicant data protection, you may contact our DPOs as follows:

If you live or are seeking work in Germany, please contact:

Barbara Broers	Unternehmensberatung für Datenschutz
Datenschutzberatung Broers	Buddenhof 5
Email: datenschutz@conduent.eu	21635 Jork, Deutschland
Mobil: +40 171 / 124 44 26	

If you live or are seeking work in any other European Union member state besides Germany, or if you work anywhere in the United Kingdom, or European Economic Area (“EEA”), please contact our European data protection office at:

Fieldfisher LLP
ConduentDPO@conduent.com

If you work in any other country besides Germany, the countries of the United Kingdom, and any EEA or European Union member state country, please contact:

Brian Clayton	Conduent Business Services, LLC
Chief Privacy Officer	100 Campus Drive
Brian.Clayton@conduent.com	Florham Park, NJ 07932
O: +1 (856) 651-2814	

Some countries recognize the concept of controllers and processors. A controller is generally an entity which has discretion about the use, collection, safeguarding and disclosure of personal information. A processor generally helps a controller process information but does not exercise independent decision making authority about the collection, use, safeguarding and disclosure of personal information.

If you work in a country which recognizes the concepts of controllers and processors, the Conduent entity, or entities, directly originally sourcing your applicant personal data for consideration for a role is the controller of your applicant personal information. Those entities may transfer your personal information to other Conduent entities so they may use it either as a controller or a processor depending upon the discretion and uses that the receiving entity may have with regard to the information.

Changes and Updates to this Notice

This Notice may be updated from time-to-time to reflect necessary changes in our privacy practices. In such cases, we will take reasonable steps designed to ensure you receive notification of any material changes to this Notice in manners and methods reasonably designed to impart notice to you, and otherwise as may be required by applicable law.

Dated: May 22, 2018

LIST OF CONDUENT AFFILIATES

Conduent Education Services, LLC
Conduent Business Services, LLC
Conduent Title Records Corporation
Conduent Government Records Srvs, Inc.
Conduent Enterprise Solutions, LLC
Conduent Care Management, Inc.
Conduent State & Local Solutions, Inc
Conduent Bus Proc Optimization Srvs, Inc
Conduent Human Services, LLC
Conduent Transport Solutions, Inc
Conduent Commercial Solutions, LLC
Conduent Credit Balance Solutions, LLC
Conduent Payment Integrity Solution Inc.
Conduent Bill Review Corporation
Conduent Customer Care Solutions, Inc.
Conduent Learning Services, Inc.
Conduent Image Solutions, Inc.
Conduent Unclaimed Property Systems, Inc.
Conduent Securities Services, Inc.
Conduent HR Consulting, LLC
Conduent HR Services, LLC
Conduent Health Administration, Inc.
Market Line S.A.
Conduent Business Services (Australasia) Pty. Ltd.
Wireless Data Services Pty Limited
Conduent Serviços de Terceirização de Processos de Negócios Ltda.
ACS HR Solucoes Servicos de Recursos Humanos do Brasil Ltda.
Conduent do Brasil Serviços de Call Center Ltda.
Conduent HR Consultants Limited/Conseillers RH
Conduent Limitée
Conduent HR Solutions Canada Co.
CPAS Systems Inc.
Conduent Business Services Canada, Inc.
Conduent Solutions Chile SA
Affiliated Computer Services (Tianjin) Co., Ltd.
ML Colombia S.A.
ACS Czech Republic s.r.o.
Conduent Solutions Dominican Republic, SAS
Affiliated Computer Services (Fiji) Limited
Conduent Business Solutions (France) SAS
Conduent Business Process Solutions S.A.S.
Affiliated Computer Services of Germany GmbH
Invoco Holding GmbH
Invoco Business Solutions GmbH
Invoco Multimedia GmbH
Invoco Technical Service GmbH
Invoco Helpline Communication GmbH

Invoco Communication Center GmbH
Invoco Customer Service GmbH
Invoco Media Sales GmbH
Invoco Service Center GmbH
Invoco Helpline GmbH
Invoco Services & Sales GmbH
Invoco Sales GmbH
Conduent Business Services de Guatemala S.A.
ACS HR Solutions Share Plan Services (Guernsey) Limited
Conduent Business Process Solutions Limited
Conduent Business Solutions (Hong Kong) Limited
Conduent Business Services India LLP
Conduent (Ireland) Limited
Conduent Business Solutions Italia S.p.A.
Conduent Business Services Italy S.r.l.
e-Services Group International (Jamaica) Limited
Conduent Solutions (Jamaica) Limited
Conduent Business Services Malaysia Sdn.Bhd
Conduent Solutions Mexico de R.L. de C.V
Conduent de Mexico S.A. de C.V.
ACS HR Solutions Nederland B.V.
Unamic/HCN B.V.
Conduent Business Services (Netherlands) B.V.
Market Line Peru S.A.C.
ACS Solutions Peru S.A.
Conduent Business Services Philippines, Inc.
Conduent Solutions Philippines, Inc. ROHQ
Affiliated Computer Services of Poland Sp. z o.o.
ACS Solutions Poland Sp. z o.o.
Conduent Business Services Romania S.r.l.
Conduent Business Process Solutions Limited
Conduent (Pty) Ltd
Affiliated Computer Services of Spain, S.L., Sociedad Unipersonal
Affiliated Computer Services GmbH
Conduent Business Solutions AG
Unamic/HCN Müşteri Hizmetleri Ltd. Şti.
Buck Consultants Limited
Buck Consultants (Healthcare)
Buck Consultants(Adm + Inv)Ltd
Conduent Parking Enforcement Solutions Limited
Wireless Data Services Limited
CVG Ltd.
Conduent Business Process Solutions Limited