

## **Personal Data Management Disclosure Notice for Applicants and Candidates for Employment by European Conduent affiliates**

Conduent understands that your privacy is important to you. This Recruitment Privacy Notice ("Notice") describes how we handle and protect your personal data in connection with our recruiting processes and programmes.

This Notice only applies to the personal data of job applicants, potential candidates for employment, and our optional recruiting programmes 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.

### **Personal data 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.

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 data about you submitted to us by others, such as if you use a recruiting service or a social media platform and publicise your personal data in a manner to invite our using it to contact you.

Some personal data we process is more sensitive. We may collect any of the following types of "Sensitive Personal Data":

- 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;
- information relating to sexual orientation;
- racial or ethnic background;
- political opinions, philosophical beliefs or religious beliefs;
- trade union membership;
- information relating to actual or alleged criminal history;

We process Sensitive Personal Data only for the specific purposes required by applicable law, and only for the purposes of determining whether to enter into an employment or contractual relationship with you. Unless otherwise required or allowed by applicable law, we will only process Sensitive Personal Data with your express consent. 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, if we need to screen candidates for criminal backgrounds, or if information about your physical or mental condition is necessary to consider accommodations for the recruitment process and/or subsequent job role.

### **Use of your personal data**

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 authorised or permitted by law; or
- emergency situations where the health or safety of one or more individuals may be endangered.

We may also analyse your personal data or aggregate or anonymise it to improve our recruitment and hiring process and enhance our ability to attract successful candidates.

## Legal basis

Our legal basis for processing your personal data as part of the recruitment process is:

- our legitimate interests as described in the ***Use of your personal data*** section above, where these are not overridden by your data protection interests or fundamental rights and freedoms;
- to comply with applicable laws, including immigration and/or employment laws and regulations;
- to take steps prior to entering an employment contract with you, where you are considered for employment;
- in circumstances where you have made the data public;
- where we have your consent to do so. Where we have requested your consent to process your personal data, you have the right to withdraw your consent at any time;
- to protect the rights and interests of the Company's Group, our employees, applicants and others, as required and permitted by applicable law.

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided below.

## How we disclose your personal data

We may disclose your personal data to:

- external recruiters and interviewers working in the country where the position for which you are applying is based, as well as to recruiters and interviewers working in different countries within the Conduent group of global companies.
- individuals performing administrative functions and information technology functions within Conduent in order to perform their jobs.
- third-party service providers who may help us process your personal data, 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).
- third-party service providers who 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).

Your personal data may also be disclosed to successor or potential successor entities and financial and legal advisors in the event of a reorganisation, 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 data to other third parties: (i) as required by law; (ii) to protect our legal rights to the extent authorised or permitted by law; or (iii) in an emergency where the health or safety of a candidate or other individual may be endangered.

## International transfers

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

Before sending your personal data to another country, we will take steps to ensure the transfer complies with law. For example, this may include: (i) ensuring the recipient is located in a country found to have a data protection legal framework providing adequate

protection; (ii) the recipient being Privacy Shield certified; (iii) entering into a contract providing protection of your personal data; (iv) transferring your data in accordance with binding corporate rules; (v) your consent.

### **Data retention**

If you accept an offer of employment with 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. The period of time will vary depending on the country from which you apply and/or where you seek employment. It will be retained for legal, regulatory and corporate compliance, to defend claims, to analyse our talent acquisition practices and to consider you for potential future roles depending upon your preferences and the location(s) where you seek employment.

You may elect to join our talent pool so that we may retain your personal data to consider you for future employment opportunities. You can withdraw from our talent pool at any time by contacting us as described in the **How to Contact Us** section of this Notice.

If you do not consent to join our talent pool, we will generally delete or de-identify your personal data within 6 months after the time period for which we are required to store it for compliance purposes, unless required by applicable law.

### **Security**

We use technical, organisational and physical measures designed to protect the integrity, confidentiality, security and availability of personal data. Among other measures, only authorised 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 unauthorised persons will not obtain access to your personal data.

### **Your rights**

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

If you have any questions or comments about our processing of your personal data, please contact our HR data protection team using the details in the **How to Contact Us** section of this Notice.

You may exercise the rights available to you under applicable data protection laws as follows:

- **The right to access, update or delete your personal data**

If you wish to access, correct, or update your personal data, please first try to do so using any self-service applications available to you. If you do not already have access to your personal data and you wish to receive access to that personal data; or if you wish to delete any such personal data and cannot do so through the self-service applications, please contact us.

- **The right to object to, or restrict, processing of your personal data**

You can object to or ask us to restrict processing of your personal data. Please note that we may still have independent legal compliance obligations to retain some or all of your personal data for such time periods as are required by law or internal compliance.

- **The right to transfer your data to another controller**

In some circumstances, you can ask us to provide you, or someone else, with your data in a structured, commonly used and machine readable format.

- **The right to withdraw your consent**

If we have collected and process your personal data 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 data conducted in reliance on lawful processing grounds other than consent.

- **The right to human review when we make automated decisions**

During our recruitment process, we may use automated testing software to determine whether you meet our recruitment criteria. We will always advise you if this is the case during the application process. We will explain to you the information we collect, why this is relevant and how it affects the outcome of your application. You will always have the opportunity to discuss your testing results with our recruitment team.

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 personal data 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, they may be unfounded, excessive or otherwise unacceptable under applicable law.

### **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 customised 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 former 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 loaded or read from certain websites, apps or services that we may use for recruiting potential applicants.

If we use Tracking Technologies on a site or service, we will provide appropriate notice and give you an opportunity to opt out of non-essential Tracking Technologies.

### **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 personal data will be submitted of our privacy practices and obtain any necessary consents prior to submitting such personal data. External recruiters and third parties submitting such applicant data represent that they have obtained all proper consents from the individual whose personal data is being submitted to allow us to use the personal data for the purposes submitted.

### **How to Contact Us**

If you have any questions or comments about this Notice, our personal data processing practices relating to recruitment, or if you wish to exercise any rights or requests with respect to your personal information, please contact:

[DSRHREMEA@Conduent.com](mailto:DSRHREMEA@Conduent.com)

### **Complaints**

If you wish to make a complaint to us about our processing of your personal data, you may contact the local Data Protection Officer.

If you live or are seeking work in any **European Union member state, or Norway, Liechtenstein, Iceland or United Kingdom**, please contact:

Fieldfisher LLP

ConduentDPO@conduent.com

Fax: +49 40 / 278

You also have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Economic Area, can be found [here](#) or obtained by contacting the DPO for your region and/or the Conduent Chief Privacy Officer.

### **Conduent controllers**

A controller is generally an entity which has discretion about the use, collection, safeguarding and disclosure of personal data. A processor generally helps a controller process personal data but does not exercise independent decision-making authority about the collection, use, safeguarding and disclosure of personal data.

The Conduent entity or entities directly sourcing your applicant personal data for consideration for a role are the controllers of your applicant personal data. Those entities may transfer your personal data to other Conduent entities, so they may use it either as a controller or a processor.

### **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:** June 2020