

## 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.

### What personal data do we collect and why?

We usually collect personal data directly from you when you apply for a role with us. The table below provides information on why we process your personal data, examples of the types of data processed for these purposes, and the grounds on which we process it.

If you apply for a specific position or positions, the information that we request from you are determined by the requirements of the country in which the position is located, and not necessarily the country in which you reside.

In addition to the personal data collected directly from candidates, we also obtain information from other sources to ensure a comprehensive evaluation and effective recruitment process. These additional sources include:

- Recruitment agencies: We may receive candidate information from recruitment agencies that assist in our hiring process.
- LinkedIn and other social media platforms: We may collect publicly available information from candidates' profiles on LinkedIn and other social media platforms to gain further insights into their professional experience and qualifications.
- Third-party vendors: We may engage third-party vendors to conduct background checks and verify information provided by candidates. These vendors collect and provide data relevant to the candidate's employment history, qualifications, and suitability for the role.

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;
- 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. *We only process Sensitive Personal Data as permitted by applicable law.* 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.

Purpose	Personal data that may be processed	Grounds for processing
<p>Processing your application and to contact you regarding your application, including identifying and evaluating candidates for potential employment.</p>	<p>Contact information (such as your name, address, email address or phone number) , date of birth, gender, employment history (including previous employers and job titles/positions), educational history, academic transcripts, achievements, test results, references, employer feedback, employer references, other details included in your application/resume, and other general information relevant to your candidacy and the roles you may seek.</p> <p>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 publicize your personal data in a manner to invite our using it to contact you.</p>	<ul style="list-style-type: none"> <li>• Legitimate interests of Conduent to manage job applications for positions with Conduent</li> </ul>
<p>Identifying and evaluating candidate for future roles that may become available.</p>	<p>Contact information (such as your name, address, email address or phone number) , date of birth, gender, employment history (including previous employers and job titles/positions), educational history, academic transcripts, achievements, test results (e.g. aptitude, skills and language tests), references, employer feedback, employer references, other details included in your application/resume, and other general information relevant to your candidacy and the roles you may seek.</p> <p>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 publicize your personal data in a manner to invite our using it to contact you.</p>	<ul style="list-style-type: none"> <li>• Legitimate interests of Conduent to manage job applications for positions with Conduent</li> </ul>
<p>Recordkeeping in relation to recruiting and hiring including previous applications to the Conduent entities.</p>	<p>Contact information (such as your name, address, email address or phone number) , date of birth, gender, employment history (including previous employers and job titles/positions), educational history, transcripts, achievements, test results, references, employer feedback, employer references, other details included in your application/resume, and other general information relevant to your candidacy and the roles you may seek.</p> <p>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 publicize your</p>	<ul style="list-style-type: none"> <li>• Legitimate interests of Conduent to manage job applications for positions with Conduent</li> <li>• Legal obligation</li> </ul>

Purpose	Personal data that may be processed	Grounds for processing
	personal data in a manner to invite our using it to contact you.	
Improving our recruitment and hiring process and enhance our ability to attract successful candidates.	<p>Contact information (such as your name, address, email address or phone number), date of birth, gender, work and educational history, achievements, test results, references, employer feedback, employer references and other general information relevant to your candidacy and the roles you may seek.</p> <p>Any feedback provided by you in relation to your recruitment process, for example in response to a survey.</p> <p>We may also analyze the above personal data, or aggregate or anonymize it for analysis in order to improve our recruitment processes.</p>	<ul style="list-style-type: none"> <li>• Legitimate interests of Conduent to manage job applications for positions with Conduent</li> </ul>
Ensuring compliance with legal requirements, including verifying your right to work in the relevant country, and diversity and inclusion requirements or practices.	<p>Your contact details including your name, contact phone number, email address. Any information that is necessary to conduct right to work checks, such as copies of ID documentation, details of your immigration/visa status and residency status.</p> <p>To the extent required or permitted by local law, information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability, age and other diversity markers.</p>	<ul style="list-style-type: none"> <li>• Legitimate interests of Conduent to ensure diversity of its workforce and equal opportunities</li> <li>• Legal obligation</li> <li>• Public Interest</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• Where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorized by law or collective agreement; or</li> <li>• Where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>
Conducting criminal background checks as permitted by applicable law.	To the extent required or permitted by local law and where necessary for a particular role, information relating to actual or alleged criminal history.	<ul style="list-style-type: none"> <li>• Legitimate interests of Conduent to protect its business interests, ensure integrity of its staff and assess suitability of candidates for roles</li> <li>• Consent, where required by applicable law</li> <li>• Public Interest</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• Where you have given us your explicit consent to do so; or</li> <li>• Where the processing is</li> </ul>

Purpose	Personal data that may be processed	Grounds for processing
		<p>necessary for the purpose of establishing, making or defending legal claims.</p>
<p>Monitoring of diversity and equal opportunities</p>	<p>To the extent required or permitted by local law, information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability, age and other diversity markers.</p>	<ul style="list-style-type: none"> <li>• Legitimate interests of Conduent to ensure diversity of its workforce and equal opportunities for employees / prospective employees</li> <li>• Consent</li> <li>• Public interest</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• Where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorized by law or collective agreement;</li> <li>• Where the processing is necessary for the purpose of establishing, making or defending legal claims; or</li> <li>• Public interest.</li> </ul>
<p>Protecting our legal rights to the extent authorised or permitted by law.</p>	<p>Any other information relevant or potentially relevant to a dispute or legal proceeding affecting us, or information that we are required to collect by applicable law.</p>	<ul style="list-style-type: none"> <li>• Legitimate interests of Conduent to deal with such disputes and proceedings</li> <li>• Legal obligation</li> </ul>
<p>Emergency situations where the health or safety of one or more individuals may be endangered.</p>	<p>Your contact details so we can facilitate communications, ensuring business continuity, protecting the health and safety of employees and others, safeguarding company property, facilitating communication in an emergency.</p> <p>For these purposes, we may also hold emergency contact information and information on your next of kin.</p>	<ul style="list-style-type: none"> <li>• Legal obligation</li> <li>• Legitimate interests of Conduent to ensure safety and wellbeing of staff and others</li> <li>• Vital interests</li> </ul> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> <li>• Where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorized by law or collective agreement; or</li> <li>• Where the processing is necessary for the purpose of establishing, making or defending legal claims.</li> </ul>

## Legal basis

The table above refers to various grounds which under data protection law we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised these grounds as Contract, Legal Obligation, Legitimate Interests, Consent, Public Interest and Vital Interests and outline what those terms mean in more detail in the table below:

Term	Ground for processing	Explanation
Contract	Processing necessary for performance of a contract with you or to take steps at your request prior to entering into a contract	This covers carrying out our contractual duties and exercising our contractual rights. For example, to enter into an employment contract with you.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we comply with our legal and regulatory obligations. For example, immigration and/or employment laws and regulations.
Legitimate interests	Processing necessary for our or a third party's legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data.  Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.
Consent	You have given specific consent to processing your data	In general, processing of your data in connection with your recruitment/employment will not be conditional on your consent. However there may be occasions where we where we may ask your consent to process your personal data. Where we have requested your consent to process your personal data, you have the right to withdraw your consent at any time.
Public Interest	Processing is necessary to perform a specific task in the public interest	In general, processing of your data will not be processed on this ground, but there may be some limited instances where this will apply. For example, this would also cover the protection of public health, and to protect against serious cross-border threats to health, as long as the relevant laws permit (such as during the COVID-19 or other, future pandemics).
Vital Interests	Processing is necessary to protect someone's life.	In general, we will not process your data on this ground but there may be rare occasions when we need to do so, for example, if we need to process personal data to save your life and administer emergency medical treatment.

If we process special category personal data about you, as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one or more of the additional grounds for processing special category personal data required under data protection law also applies. These are set out below:

- Where you have provided your explicit consent;
- Where the processing is necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement;
- Where the processing relates to data about you that you have made public (e.g. if you tell colleagues that you are ill);
- Where the processing is necessary for the purpose of establishing, making or defending legal claims; or
- Where the processing is necessary for reasons of substantial public interest in so far as it is based on local 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 data is mandatory or not (as well as of the possible consequences if you do not provide your personal data).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal

data, please contact us using the contact details provided below.

### **Who we disclose your personal data to**

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).
- clients, where necessary, in the context of providing services or as part of our business operations.

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) relying on approved standard contractual clauses i.e. the Standard Contractual Clauses approved by the European Commission for data transfers from the European Union or for transfers from the UK, the UK Addendum or International Data Transfer Agreement approved by the Information Commissioner's Office.

### **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.

## 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.

## 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 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.

## 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 data, please contact:  
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 **United Kingdom**, please contact:  
Fieldfisher LLP ConduentDPO@conduent.com

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 Union, can be found [here](#) or obtained by contacting the DPO for your region and/or the Conduent Chief Privacy Officer at DataPrivacy@Conduent.com.

### **Conduent controllers**

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:** October 2024