

## **The Conduent Group of Companies – Employee and Personnel Personal Information Management Disclosure Notice**

---

This notice provides an overview about how Conduent Business Services, LLC and its affiliated companies (“Conduent”, “we”, “us”, “our”) collect, use, store, safeguard and disclose personal information of our Personnel as it relates to the employment or working relationship. As used in this Notice the term “Personnel” includes employees of any Conduent affiliated entities, as well as individual contractors and contingent workers whose personal information is collected by that Conduent entity in order to administrate the employment relationship, such as for payroll and security access to facilities working relationship (“you”, “your”). This Notice applies only to Personnel as defined herein, working directly for Conduent entities and does not apply to our processing activities for employees working for our clients, and does not apply to our processing of your personal information when it is processed for other purposes not related to the employment or working relationship (such as if you might call into a call centre we manage for a client, or if you take employment with a client and your personal information is managed as an end-user of your then employer’s use of Conduent services). This Notice specifically excludes candidates or applicants for employment or subcontracting, or directly to any individual consumers or end-user customers of Conduent or our clients. This Notice is intended to provide notice to Personnel regarding Personal Data in an effort to be compliant with the relevant data privacy laws and regulations of the jurisdictions in which Conduent operates as well as compliance with its own privacy policies and standards.

This Notice does not replace any other notices or consents provided by any Conduent entity where Personnel are employed, but rather supplements existing notices, personnel policies and employment contracts to the extent allowed by applicable law. All Personnel must follow all relevant locally applicable policies, standards, training and contracts. You may have received other data protection notices or written materials when you were hired. You must continue to follow those existing notices and materials. To the extent this Notice conflicts with any locally applicable law or approved policy or contracts; the notices, and any consents, approved policies, or contracts required by local law and/or previously delivered and entered into will prevail and take precedence over any conflicting terms of this Notice.

Conduent seeks to appropriately protect the personal information of Personnel. Personal information is information which alone, or when combined with other information, identifies or can be used to identify an individual.

### ***What personal information do we collect of Personnel?***

As part of hiring and managing Personnel, we collect, use, safeguard and sometimes disclose various types of personal information such as your name, business and personal address, work phone number (including company owned and issued mobile phone and/or where allowed and where you may consent to provide it, your personal mobile phone number used for work), work email, date and place of birth, gender, marital status, photograph (such as for security badges or if you choose to provide it in company videos or online systems), personal details of dependents, emergency contacts, beneficiary or participant details if provided for enrolment in benefits plans, citizenship, residency, work permit identifiers, immigration information, banking details (account numbers, electronic funds transfer information), work time records (hours/days worked, absences records, holidays), leave request and or grant information, hire date, termination date, payroll information (salary, withholding, tax information), benefits enrolment/unenrolment information, insurance claims/payment information, medical or other leave supporting information (dependents, medical or physical conditions), description of current position, title, unit/department, supervisor(s), direct reports, employee identification number, employment status and type, terms of employment, employment contract, work history, length of service, retirement eligibility, promotions, disciplinary records, details contained in letters of application and résumé/CV, previous employment background, professional references, education history, professional qualifications, language proficiency and other relevant skills, performance review information – including goals and assessments, training and disciplinary events.

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 licence 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 behaviour 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 unauthorised 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, and for the specific purposes, required by applicable law for which it must be used, only for the performance of the employment relationship, and/or to provide and administer benefits to you and your beneficiaries in any benefits plans in which you may enrol. Unless otherwise required or allowed by applicable law or to manage the employment relationship, we will only process Sensitive Personal Information with your express consent.

***How do we collect personal information of personnel?***

For the most part, we collect your personal information directly from you when you provide it to us to start or continue the working relationship with us. We also collect information about you from third-parties as required by applicable law and as required for our compliance requirements. For example, we may collect information about you for criminal (where allowable) or reference checks, background screening, compliance screening for banned persons, or from learning, education, or industry association providers (such as for information about your certifications, compliance training, or professional qualifications). Some of this information may be obtained from publicly available sources. Generally, the type of data involved will be your name, address, date of birth, prior working history, background screening information, and/or other information sufficient to identify you and ensure that you are not confused with another person of similar name.

## ***Why do we collect and safeguard this personal information of personnel?***

We collect, use, safeguard and disclose your personal information and Sensitive Personal Information primarily to create, perform and manage the employer/employee or subcontracting relationship, or to protect your vital interests (such as when collected and used for health and emergency contact information). If you choose not to provide the personnel personal information which we must collect under this Notice for purposes of employment or your working relationship, it is possible we may not be able to provide you with access to physical places and electronic systems that may be necessary for you to do your work; and consequently, we may not be able to begin or maintain the working relationship with you. Some information may be processed for which your specific, express consent may be requested. In that event you will receive additional disclosure notices for the various uses or systems and you will be given the opportunity to voluntarily grant your consent. You will be informed of the consequences of not providing such consent. Most of your personal information is processed for various reasons including the following:

### **Ordinary Personnel administration**

Managing the work activities of Personnel generally including hiring/appointments or removals, performance reviews, promotions, succession planning, administering salary and expense processing, discipline, staffing, work management, processing business travel arrangements.

### **Benefits administration**

Administering benefits including pensions and savings plans, superannuation, share unit grants/awards, bonuses, leave requests and leave processing, life insurance, health insurance, vision insurance, dental insurance, or other employee benefits programmes.

### **Training**

Administering training and workforce learning and development.

### **Compliance**

Providing compliance training, learning, seminars and awareness programmes. Conducting investigations, receiving and administering complaints, ethics reporting administration (which could include whistleblower reporting), disciplinary actions and measures. Vetting people against compliance lists where required by applicable law such as to determine if someone is on a banned persons list, or unable to work for specific client or internal functions. Complying with policies, collective bargaining agreements and legal requirements, such as income tax and national insurance deductions, record-keeping and reporting obligations (including for health, benefits, anti-discrimination compliance), conducting audits, compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, defending litigation and managing any internal complaints.

### **Communications and emergencies**

Facilitating communication at the workplace location, home and when individuals are travelling, ensuring business continuity, protecting the health and safety of employees and others, safeguarding company property, facilitating communication in an emergency.

### **To provide and administer technology resources**

Administering the provision and use of information technology resources such as computers, phones, media storage, software applications, email, global directory listings, instant messaging (chat) and other electronic communications

systems, facsimiles, printers and other business systems, and allowing and restricting access to such resources for necessary functioning of such systems such as allowing them to work and providing system security.

**To monitor the use of and information processed through technology and other resources**

Administering systems and processes designed to monitor use of technology and other resources including all electronic devices, files, applications, electronic communications and hard-copy materials.

**To monitor work processes electronically and/or physically**

Examining work processes such as use of technology resources and limiting or restricting use of such systems, and/or observing physical work areas, work processes and movement of people through technology or human interaction (including badge access security controls, video or audio capture technology), where and to the extent allowed by applicable law.

**To provide social interaction tools among Personnel**

Providing systems and platforms for Personnel to interact and/or communicate with one another, such as intranet sites, social networking services, or otherwise.

**For financial management and budgeting**

To analyse costs, prepare financial projections, audits, measure and benchmark compensation and benefits, withhold and pay taxes, structure business operations and otherwise engage in financial management activities arising from personnel management.

**To process Personnel mental and physical health information**

To process mental and physical health information, including information relating to the payment for medical treatment or diagnosis for benefits administration, leave requests, health and wellness programmes, recreation, meals and dietary restrictions, accommodation and related requests, or otherwise.

**To process information arising from Personnel or candidate background checks including criminal records searches, where and as allowed by applicable law.**

**To process information relating to mergers, acquisitions, re-organisations, sales, or business divestitures.**

***We share personnel personal information among Conduent entities and with third parties.***

Conduent sometimes shares Personnel personal information among its affiliated entities for all of the purposes otherwise set forth in this Notice. A list of the Conduent affiliated entities which may access Personnel personal information is attached to this Notice.

We also share Personnel personal information with various third parties to help us administer the employee or contracting relationship for the purposes described in this Notice; and, when necessary in the event of a sale, re-organisation, merger, acquisition, assignment, or divestiture of all or any part of Conduent business. Such third-party providers have access to Personnel personal information solely for the purposes of performing the services for which we have engaged that third party. We take reasonable steps designed to ensure that these third parties have and maintain security and privacy measures to process Personnel personal information consistent with

this Notice and Conduent information security and privacy requirements. We will enter into appropriate written obligations requiring these providers to manage your personal information in accordance with this Notice.

Such third parties may be used for purposes such as providing a human resources general information system, including our use of the Oracle Human Capital Management system (known internally as GEMS – allowing us to administer the working relationship generally), to help us on-board employees, to conduct background checks, to receive and process payrolls, to manage Personnel performance, hiring, promotion, and termination, to administer benefits and manage benefits plans (such as health, retirement, and disability), to allow for electronic and print communications systems (such as email, instant messaging and others).

We share Personnel personal information among Conduent affiliates and third parties only where, and to the extent, there is a need-to-know such information.

We may also disclose personal information to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant.
- In response to lawful requests by public authorities (including for national security or law enforcement purposes).
- As necessary to establish, exercise or defend against potential, threatened or actual litigation.
- Where necessary to protect the vital interests of another person.
- In connection with the sale, assignment or other transfer of all or part of our business.
- With your written consent.

### ***We transfer personal information of Personnel globally***

Conduent entities operate in many countries around the world. 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 recognised 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.

***How long do we retain Personnel personal information?***

We store personal information about Personnel for the entire time that you work with us, and for periods of time after you no longer work with us as required by applicable laws and/or in accordance with other internal compliance policies. We may be required to retain employee data for various time periods depending upon which countries' laws apply to your employment relationship with us. We will retain personal information pertaining to Personnel for a reasonable period of time after the end of the working relationship to respond to employment or work-related inquiries or to deal with any legal matters (e.g. judicial or disciplinary actions), document the proper termination of employment or work relationship, and/or to provide you with ongoing retirement or other benefits (such as where we may continue to manage or provide benefits to you after employment with us ceases) and to confirm your employment with us.

***What are your rights and options concerning Personnel personal information?***

Should you have any questions or comments about our processing of Personnel 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 in which you currently work. For a listing of the DPO for your region, 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 to Personnel 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 usable format.
3. If you are a resident of a country that provides you with the right to object to processing of your Personnel 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 processed your Personnel personal information based upon your consent, 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. 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)

***We do not engage in automated processing for decision-making or profiling involving the personal information of Personnel***

We currently do not use Personnel personal information to reach decisions that may affect you which are made solely through automated processing activities. Conduent uses electronic processing systems and applications, and uses personal information relating to Personnel to make business decisions, including salary expenses and financial planning, mergers, acquisitions, divestitures, compensation, promotions and termination from employment. For any decisions that may have an impact upon individual Personnel, we will not take such actions on such decisions without first having underlying data processed in automated systems reviewed by humans who can provide independent judgement and input. We will take reasonable steps designed to ensure the accuracy, completeness and currency of the data processed in electronic systems used in such decisions.

***How to contact us***

Should you have any questions or comments about this Notice, our Personnel personal information processing practices, or if you wish to exercise any rights or requests with respect to your Personnel 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, or update your personal information, or if you wish to object to processing of your Personnel personal 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 work anywhere in Central, South America, or the Caribbean: [DSRHLATAM@Conduent.com](mailto:DSRHLATAM@Conduent.com)

If you work in the United States or Canada: [DSRHRNA@Conduent.com](mailto:DSRHRNA@Conduent.com)

If you work in the India, Asia – Pacific region: [DSRHRAPAC@Conduent.com](mailto:DSRHRAPAC@Conduent.com)

If you work in Europe, Middle East or Africa: [DSRHREMEA@Conduent.com](mailto:DSRHREMEA@Conduent.com)

For other questions or comments about this Notice, or Conduent’s workforce personal information handling practices, and for any other reasons concerning workforce data protection, you may contact our Data Protection Officer(s) listed below.

**DPO contacts:**

If you work in **Germany**, please contact (please include the name of the company for which you work):

Ann-Christin Anders

Betriebliche Datenschutzbeauftragte CONDUENT Deutschland

Invoco Holding GmbH

Friedrich-Ebert-Damm 111

22047 Hamburg

E-mail: [annchristin.anders@conduent.com](mailto:annchristin.anders@conduent.com)

Mobile phone:+49 151 / 42 42 13 44

Fax: +49 40 / 278 249 41

If you 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 Privacy office at:

**Fieldfisher, LLC**  
**ConduentDPO@Conduent.com**

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

Brian Clayton, Chief Privacy Officer  
O: +1 (856) 651-2814  
**Brian.clayton@conduent.com**

**Conduent Business Services, LLC**  
100 Campus Drive  
Florham Park, NJ 07932

### ***Controllers and processors***

Some countries recognise 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 recognises the concepts of controllers and processors, the Conduent entity directly employing you is the **controller** of your Personnel personal information. This direct employer entity may transfer your Personnel 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. With respect to Personnel personal information, Conduent Business Services, LLC, a business entity headquartered in the United States of America, will likely receive transfers of your Personnel personal information in a status as a co-controller of your information with your direct employer. Conduent Business Services, LLC will receive the transfer of this information in accordance with the provisions on international personal information transfers otherwise set forth in this Notice

### ***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: 1 May 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