

# The Conduent Group of Companies – Employee and Personnel Personal Data Privacy Notice (GDPR)

This notice explains how Conduent Business Services, LLC group companies located in Europe ("Conduent", "we", "us", "our") process and appropriately protect the Personal Data relating to our Employees and other Personnel. This notice also explains how group companies outside of Europe which are subject to European data protection laws by virtue of either monitoring the behaviour of Personnel in Europe (for example monitoring of IT systems usage for security purposes) or by offering them goods and/or services (such as the opportunity to take advantage of third party sourced learning products), will process and appropriately protect their Personal Data. References to "Conduent", "we", "us", "our" in this notice will include these non-European group entities as well as all European group entities. "Personal Data" is information which alone, or when combined with other information, identifies or can be used to identify an individual. As used in this Notice the term "Personnel" includes employees of any Conduent affiliated entities, as well as individual contractors and contingent workers ("you", "your").

Depending on the scope of your role within Conduent, you may use certain tools or applications ("applications") that are subject to separate notices. If a specific notice applies to any application you use in your role, this will be presented to you when you use it.

## What Personal Data Do We Collect of Personnel and why? (Page 1 (of current personnel privacy notice))

As part of managing Personnel, we process various types of Personal Data. 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.

Where it is relevant to your employment, we may process Personal Data which is more sensitive. As used in this Notice, Sensitive Personal Data is Personal Data that reveals any of the following: medical information or health status; biometric data, such as facial features, fingerprints, or retinal images; 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 relating to actual or alleged criminal history; genetic information. For example, data relating to ethnic origin which we may process for the purpose of monitoring and improving diversity and inclusiveness at our workplaces or for defending claims against Conduent and data relating to physical or mental health which we may process for adapting your workspace or patterns, administering insurance policies, enrolling in government sponsored healthcare and social security programs in connection with your employment or defending claims against Conduent. We will only process Sensitive Personal Data where permitted or required by applicable law or with your express consent. Please note that we may not process any or all of the categories of Sensitive Personal Data listed in this paragraph.

| Purpose   | Personal data that may be processed  | Grounds for processing   |
|---|--|--|
| Personnel Administration:<br>General personnel administration<br>including allocation of work,<br>performance reviews, promotions,<br>succession planning, staffing,<br>work management, processing<br>business travel arrangements,<br>managing leave requests, health<br>and wellness programs,<br>recreation, meals and dietary<br>restrictions, accommodations and<br>related requests, or otherwise. | Your contact details including your<br>name, business and personal address,<br>work phone number (including<br>company owned and issued cell phone<br>and/or where allowed and where you<br>may consent to provide it, your<br>personal cell phone number used for<br>work), work email, date and place of<br>birth, gender, marital status, personal<br>details of dependents and emergency<br>contact<br>Information on your employment with<br>Conduent including description of<br>current position, hire date, termination<br>date, supervisor(s), direct reports,<br>employee identification number,<br>information system identification<br>number(s), employment status and<br>type, terms of employment,<br>employment contract, work and<br>education history, retirement eligibility,<br>promotions, performance review<br>information – including goals and<br>assessments, training, and disciplinary<br>events, grievance procedures, leave<br>request and/or grant information,<br>sickness/holiday and working time<br>records. Details of your hobbies and<br>interests.<br>Information on physical health<br>conditions, allergies and dietary<br>requirements<br>Citizenship, residency, work permit<br>identifiers and immigration<br>information. | <ul> <li>Contractual necessity</li> <li>Legitimate interests of managing its workforce and staff planning</li> <li>In relation to Sensitive Personal Data:</li> <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> |
| Recruitment and hiring process  | Your contact details including your<br>name, personal address, contact<br>phone number, email address, date<br>and place of birth, gender, marital<br>status.<br>Information concerning your<br>application and our assessment of it,<br>details contained in letters of<br>application and resume/CV, work and<br>education history, professional<br>references, professional qualifications,   | <ul> <li>Contractual necessity</li> <li>Legitimate interests for recruitment purposes</li> <li>In relation to Sensitive Personal Data:</li> <li>Where the processing is necessary for the purposes of your or our obligations and rights in</li> </ul>   |

| Purpose  | Personal data that may be  | Grounds for processing  |
|--|--|---|
|  | processed<br>language proficiency and other<br>relevant skills, any checks we may<br>make to verify information provided or<br>background checks and any<br>information connected with your right<br>to work, citizenship, residency, work<br>permit identifiers, immigration<br>information and banking details. Your<br>application may also include details of<br>your hobbies and interests.<br>Records of our decision-making<br>process in relation to your application. | <ul> <li>relation to employment<br/>in so far as it is<br/>authorized by law or<br/>collective agreement; or</li> <li>where the processing is<br/>necessary for the<br/>purpose of establishing,<br/>making or defending<br/>legal claims.</li> </ul> |
|  | If relevant, and to the extent required<br>or permitted by local law, we may also<br>process information concerning your<br>health, any disability and in connection<br>with any adjustments to working<br>arrangements.   |   |
| <b>Training and development:</b><br>Administering training and<br>workforce learning and<br>development; providing<br>compliance training, learning,<br>seminars, and awareness<br>programs (including improving and<br>developing our training materials<br>for employees and our policies and<br>procedures through surveys,<br>questionnaires and feedback) | Your contact details including your<br>name, contact phone number, email<br>address.<br>Information on your employment with<br>Conduent including description of<br>current position, supervisor(s), direct<br>reports, employee identification<br>number, information system<br>identification number(s), employment<br>status and type.  | <ul> <li>Contractual necessity</li> <li>Legitimate interests of<br/>developing the skillset<br/>of the Conduent<br/>workforce, maintaining<br/>records of such training<br/>and performance.</li> </ul>   |
|  | Performance review information –<br>including goals and assessments,<br>training, attendance records.  |   |
| Administering your contract<br>including entering it, performing it<br>and changing it. This may include<br>background checks including<br>criminal records searches, where<br>and as allowed by applicable law.   | This includes your contact details (i.e.<br>your phone number, address and<br>email address) and identification data<br>(including name or alias, gender,<br>national identity document number, tax<br>registration number, social security<br>information and other details in identity<br>documents (Conduent may also<br>collect copies of such IDs)).  | <ul> <li>Contract</li> <li>Legal obligations</li> <li>Legitimate interests of running the Conduent business effectively</li> <li>In relation to Sensitive Personal Data:</li> </ul>   |
|  | Information on your terms of<br>employment (e.g. description of<br>current position, promotions,<br>performance information (including<br>goals and assessments, training, and   |   |

| Purpose   | Personal data that may be  | Grounds for processing  |
|---|--|---|
|   | processed  |   |
|   | disciplinary events), hire date and<br>termination date), employment status<br>and type or engagement from time to<br>time including your pay and benefits<br>(including pensions and savings plans,<br>superannuation, stock grants/awards,<br>bonuses, leave requests, insurance, or<br>other employee benefits programs),<br>your participation in pension<br>arrangements, life and medical  | <ul> <li>Where you have provided your explicit consent;</li> <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 putposized by law are</li> </ul>   |
|   | insurance and any bonus or share<br>scheme.<br>If relevant, and to the extent required<br>or permitted by local law, we may also<br>process information concerning your<br>health, any disability and in connection<br>with any adjustments to working<br>arrangements.  | <ul> <li>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>   |
| Payroll administration including<br>administration of benefits,<br>pensions payments, trade union<br>memberships. | Your contact details including your<br>name, contact phone number, email<br>address.<br>Information required to pay you<br>including your hire date, termination<br>date, description of current position,<br>bank account details, salary, pension<br>contributions and details of other<br>benefits (including savings plans,<br>superannuation, stock grants/awards,<br>bonuses, leave requests, insurance, or<br>other employee benefits programs),<br>beneficiary or participant details if<br>provided for enrolment in benefits<br>plans, retirement eligibility and<br>information on tax and social security /<br>national insurance. | <ul> <li>Contract</li> <li>Legal obligation</li> <li>Legitimate interests to maintain records and details to support payroll and benefits information and budget planning</li> <li>In relation to Sensitive Personal Data:         <ul> <li>Where you have provided your explicit consent;</li> <li>where the processing</li> </ul> </li> </ul> |
|   | Information on attendance, work time<br>records, leave request and/or grant<br>information, holiday and other leave<br>and sickness absence.<br>Citizenship, residency, work permit<br>identifiers and immigration<br>information.   | <ul> <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</li> </ul>   |

| Purpose   | Personal data that may be processed   | Grounds for processing  |
|---|---|---|
|   |   | establishing, making or defending legal claims.   |
| Financial management and<br>budgeting   | Information about your role with<br>Conduent including your contact<br>details including your name, contact<br>phone number, email address, job<br>title/position, hire date, termination<br>date, retirement eligibility,<br>remuneration and promotion<br>information to analyze costs, prepare<br>financial projections, audits, measure<br>and benchmark compensation and<br>benefits, withhold and pay taxes,<br>structure business operations, and<br>otherwise engage in financial<br>management activities arising from<br>Personnel management.  | <ul> <li>Legal obligation</li> <li>Legitimate interests of<br/>Conduent</li> </ul>  |
| Business analytics and management reporting                                     | Aggregated information as listed in this privacy notice to track headcount and attrition of employees   | <ul> <li>Legitimate interests of<br/>running the Conduent<br/>business effectively</li> </ul>   |
| Supporting and managing your<br>work and performance and any<br>health concerns | Your contact details including your<br>name, contact phone number, email<br>address.<br>Information connected with your<br>work, anything you do at work and<br>your performance including records<br>of documents and emails created by<br>or relating to you and information on<br>your use of our systems including<br>computers, laptops or other devices.<br>Management information regarding<br>you including notes of meetings and<br>appraisal / performance records.<br>Information relating to your<br>compliance with our policies.<br>Information concerning disciplinary<br>allegations, investigations and<br>processes and relating to grievances<br>in which you are or may be directly or<br>indirectly involved.<br>To the extent required or permitted by<br>local law, information concerning<br>your health, including self- | <ul> <li>Contract</li> <li>Legal obligation</li> <li>Legitimate interests of running the Conduent business effectively</li> <li>In relation to Sensitive Personal Data:</li> <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> </ul> |

| Purpose   | Personal data that may be processed   | Grounds for processing   |
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|   | certification forms, fit notes and medical and occupational health reports.   | <ul> <li>where the processing<br/>relates to data about<br/>you that you have<br/>made public.</li> </ul>  |
| Changing or ending your<br>working arrangements | Your contact details including your<br>name, contact phone number, email<br>address.<br>Information connected with anything<br>that may affect your continuing<br>employment or the terms on which<br>you work including any proposal to<br>promote you, to change your pay or<br>benefits, to change your working<br>arrangements or to end your<br>employment, e.g. hire date,<br>termination date, retirement eligibility,<br>promotions, performance review<br>information (including goals and<br>assessments, training, and<br>disciplinary events) and medical or<br>other leave supporting information.   | <ul> <li>Contract</li> <li>Legitimate interests of running the Conduent business effectively</li> <li>In relation to Sensitive Personal Data:</li> <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 the purpose o</li></ul> |
|   | Your contact details including your<br>name, contact phone number, email<br>address.<br>Security and access data including<br>access card log data and CCTV at<br>our premises, photographs and<br>audio-visual recordings, fingerprint<br>data, building entry / exit data where<br>required to access certain systems<br>(to the extent permitted by law and<br>required by your specific role)<br>Where you drive to our offices, we<br>might collect vehicle data including<br>license plates and document this data<br>in our records<br>To the extent required or permitted by<br>local law, information regarding your<br>use of IT resources, tools and | <ul> <li>establishing, making or defending legal claims.</li> <li>Legal obligation</li> <li>Legitimate interests (specifically to ensure the security of Conduent systems, premises and staff)</li> <li>In relation to Sensitive Personal Data:</li> <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> </ul>  |

| Purpose  | Personal data that may be processed  | Grounds for processing   |
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|  | equipment provided by Conduent<br>including IP addresses, network<br>identification data, activities<br>conducted on Conduent's IT<br>applications and systems, data<br>usage, cookies, device IDs, web<br>browsing history, etc.  | <ul> <li>where the processing<br/>is necessary for the<br/>purpose of<br/>establishing, making or<br/>defending legal claims.</li> </ul>                 |
| Providing references in<br>connection with your finding new<br>employment  | Your contact details including your<br>name, contact phone number, email<br>address.<br>Information on your working for us<br>and on your performance, e.g.<br>promotion information, employment<br>status and type, performance review<br>information (including goals and<br>assessments, training, and<br>disciplinary events).   | <ul> <li>Consent</li> <li>Legitimate interests of<br/>data subjects,<br/>Conduent and third<br/>parties in respect of<br/>workforce migration</li> </ul> |
| Providing information to third<br>parties in connection with<br>transactions that we contemplate<br>or carry out | Your contact details including your<br>name, contact phone number, email<br>address.<br>Information on your contract and<br>other employment data that may be<br>required by a party to a transaction<br>such as a prospective purchaser,<br>seller or provider of outsourced<br>services (e.g. during mergers,<br>acquisitions, re-organizations, sales,<br>or business divestitures).<br>This would also include customer<br>tenders, business process execution<br>and support including providing key<br>contact and other details of support<br>staff, delivering products and<br>services, responding to customer<br>questions, providing customer<br>support and sharing news and<br>updates about Conduent products<br>and services. | Legitimate interests of<br>Conduent to allow it to<br>run its business<br>effectively  |
| Monitoring of diversity and equal opportunities  | Your contact details including your<br>name, contact phone number, email<br>address.<br>To the extent required or permitted by<br>local law, information on your<br>nationality, racial and ethnic origin,   | Legitimate interests of<br>Conduent to ensure<br>diversity of its<br>workforce and equal<br>opportunities for<br>employees                               |

| Purpose   | Personal data that may be processed   | Grounds for processing   |
|---|---|--|
|   | gender, sexual orientation, religion,<br>disability, age and other diversity<br>markers.  | <ul> <li>Consent</li> <li>Public Interest</li> <li>In relation to Sensitive Personal Data:</li> <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> |
| Monitoring and investigating<br>compliance with policies,<br>standards and procedures, rules<br>and other legal requirements<br>(generally and specifically)<br>including investigations, dealing<br>with complaints and whistleblower<br>reporting, vetting people against<br>compliance lists where required by<br>applicable law, conducting audits,<br>compliance with government<br>inspections. | Your contact details including your<br>name, contact phone number, email<br>address.<br>We expect our staff to comply with<br>our policies and rules and may<br>monitor our systems to check<br>compliance. We may also have<br>specific concerns about compliance<br>and check system and other data to<br>look into those concerns (e.g. log in<br>records, records of usage and emails<br>and documents, CCTV images,<br>photographs and audio-visual<br>recordings and data collected for<br>access including swipe card records,<br>entry and exit records). | <ul> <li>Legitimate interests of<br/>Conduent to monitor<br/>compliance with its<br/>law, policies and<br/>procedures</li> </ul>   |
| Monitoring work processes<br>electronically and/or physically   | Your contact details including your<br>name, contact phone number, email<br>address.<br>Information about your employment<br>including access rights, role, work<br>products.<br>Information about regarding your use<br>of IT resources, tools and equipment   | Legitimate interests to<br>monitor use of systems<br>and processes to<br>ensure effective and<br>compliant use   |

| Purpose   | Personal data that may be processed   | Grounds for processing  |
|---|---|---|
|   | provided by Conduent, CCTV, wipe<br>card records, building entry / exit data<br>where and to the extent allowed by<br>applicable law.   |   |
| Administering<br>informationthe<br>technology<br>resourcesresourcessuch as phones and<br>electronicelectronicdevices,<br>software<br>applications,<br>globaldirectory<br>listings,<br>communications,<br> | Information to contact you including<br>your name, work and personal<br>contact details.<br>Information regarding your use of IT<br>resources, tools and equipment<br>provided by Conduent including IP<br>addresses, network identification<br>data, activities conducted on<br>Conduent's IT applications and<br>systems, data usage, cookies, device<br>IDs, web browsing history, etc.  | <ul> <li>Legitimate interests of<br/>Conduent to manage<br/>its resources<br/>effectively, and<br/>planning purposes</li> </ul>   |
| Disputes and legal proceedings  | Any other information relevant or<br>potentially relevant to a dispute or<br>legal proceeding affecting us.   | <ul> <li>Legitimate interests of<br/>Conduent to deal with<br/>such disputes and<br/>proceedings</li> <li>Legal obligation</li> <li>In relation to Sensitive Personal<br/>Data, where the processing is<br/>necessary for the purpose of<br/>establishing, making or<br/>defending legal claims.</li> </ul> |
| Day to day business operations<br>including marketing,<br>customer/client relations, support<br>and service customers, providing<br>news and updates on Conduent<br>products and services.                | Any other Information relating to the<br>work you do for us, your role and<br>contact details including relations<br>with current or potential customers or<br>clients. This may include a picture of<br>you for internal or external use and<br>promotional photographs (for<br>example to be included in brochures,<br>on our corporate websites, for display<br>at events or in bids for client work) or<br>audio-visual recordings.<br>Information used on global or local<br>internal or external directories to<br>identify what you do and how you can<br>be contacted (to enable collaboration<br>with colleagues and others).<br>Where necessary, we may share<br>your Personal Data with Conduent | <ul> <li>Legitimate interests of<br/>Conduent for the<br/>running of its business,<br/>marketing services and<br/>providing<br/>products/services to<br/>clients</li> </ul>   |

| Purpose  | Personal data that may be processed   | Grounds for processing  |
|--|---|---|
|  | customers or prospective customers<br>including for example where we are<br>being audited, where we are<br>tendering for customer work, you are<br>seconded to a customer, working on<br>a customer site or otherwise involved<br>in provision of services to customers.  |   |
| Maintaining appropriate<br>business records during and<br>after your employment or<br>engagement | Your contact details including your<br>name, contact phone number, email<br>address.<br>Information relating to your work,  | <ul> <li>Contract</li> <li>Legal obligation</li> <li>Legitimate interests to</li> </ul>   |
|  | anything you do at work and your<br>performance relevant to such<br>records.  | run and maintain its<br>business effectively  |
| Emergency medical treatment  | Your contact details including your<br>name, contact phone number, email<br>address.<br>Information on any physical or mental<br>health conditions.<br>Any other information required to<br>notify your close contact(s) of any<br>incident at or in connection with work<br>and to allow responsible people to<br>administer emergency medical<br>treatment, e.g. personal details of<br>dependents or emergency contacts, | <ul> <li>Vital Interests</li> <li>In relation to Sensitive Personal Data:</li> <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</li> </ul> |
|  |   | is necessary for the<br>purpose of<br>establishing, making or<br>defending legal claims.  |
| Communications and<br>Emergencies  | Your contact details at both home<br>and work so we can facilitate<br>communications at the workplace<br>location, home and when individuals<br>are traveling, ensuring business<br>continuity, protecting the health and<br>safety of employees and others,<br>safeguarding company property,<br>facilitating communication in an<br>emergency.  | <ul> <li>Legal obligation</li> <li>Legitimate interests of<br/>Conduent to ensure<br/>safety and wellbeing of<br/>staff</li> <li>Vital interests</li> <li>In relation to Sensitive Personal<br/>Data:</li> </ul>  |

| Purpose | Personal data that may be processed  | Grounds for processing  |
|---------|--|---|
|         | For these purposes we may also hold<br>emergency contact information and<br>information on your next of kin. | <ul> <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> |

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<br>of a contract with you or to take steps<br>at your request to enter a contract | This covers carrying out our<br>contractual duties and<br>exercising our contractual<br>rights. For example, bank<br>details used to pay salaries and<br>benefits.  |
| Legal obligation     | Processing necessary to comply with<br>our legal obligations   | Ensuring we perform our legal<br>and regulatory obligations. For<br>example, providing a safe place<br>of work, tax/audit obligations<br>and avoiding unlawful<br>discrimination.   |
| Legitimate interests | Processing necessary for our or a third<br>party's legitimate interests  | We or a third party have<br>legitimate interests in carrying<br>on, managing and<br>administering our respective<br>businesses effectively and<br>properly and in connection with<br>those interests processing your<br>data. |

| Term            | Ground for processing  | Explanation   |
|-----------------|--|---|
|                 |  | Your data will not be processed<br>on this basis if our or a third<br>party's interests are overridden<br>by your own interests, rights<br>and freedoms.  |
| Consent         | You have given specific consent to processing your data                    | In general, processing of your<br>data in connection with<br>employment will not be<br>conditional on your consent.<br>But there may be occasions<br>where we do specific things<br>such seeking to monitor<br>diversity or providing a one-off<br>voluntary benefit and rely on<br>your consent to our doing so.   |
| Public Interest | Processing is necessary to perform a specific task in the public interest. | In general, processing of your<br>data will not be processed on<br>this ground, but there may be<br>some limited instances, for<br>example, for diversity and<br>inclusiveness monitoring<br>purposes. This would also<br>cover the protection of public<br>health, and to protect against<br>serious cross-border threats to<br>health, as long as the relevant<br>laws permit (such as during the<br>COVID-19 or other, future<br>pandemics). |
| Vital Interests | Processing is necessary to protect someone's life.                         | In general, we will not process<br>your data on this ground but<br>there may be rare occasions<br>when we need to do so, for<br>example, if we need to process<br>personal data to save your life<br>and administer emergency<br>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.

# Where Do We Collect Personal Data of Personnel?

For the most part, we collect your Personal Data directly from you when you provide it to us to start or continue the working relationship with us.

We may also collect information about you from third-parties. 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 also 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.

We may also collect personal information at Conduent related events such as video recordings or photographs which may be used for promotional purposes.

# We Share Personnel Personal Data Among Conduent Entities and with Third-Parties. (Page 3)

Conduent sometimes shares Personnel Personal Data among its affiliated entities and various third parties for all of the purposes described in this Notice.

Where necessary, we may share your Personal Data with Conduent customers or prospective customers including for example where we are being audited, where we are tendering for customer work, you are seconded to a customer, working on a customer site or otherwise involved in provision of services to customers.

We may also share your Personal data with third party service providers, such as insurance brokers or benefits providers.

Lastly, we may also share your Personal Data with law enforcement bodies, courts or other public authorities where necessary to abide by law, to respond to a court order, administrative or judicial process or any other lawful requests by public authorities (including for national security or law enforcement purposes).

## We Transfer Personal Data of Personnel Globally.

Conduent entities operate in many countries around the world. As a global company we may need to transfer your Personal Data so that it is 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 Data as the country in which you are located or from which your Personal Data was originally collected.

If we need to make such transfers, we will take steps designed to ensure that the recipient of access to that Personal Data has effective controls in place designed to adequately protect the information. Before transferring your Personal Data, 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) we shall enter into appropriate approved contractual clauses allowing the transfer; (iii) we have binding corporate rules in effect with the recipient for the type of data and use involved in the transfer; (vi) we have your specific consent (where required by applicable law for the type of data); (vii) we are making the transfer under another legally allowed purpose under applicable laws. In particular, we have implemented an intra-group data transfer agreement to cover any transfer of your Personal Data between Conduent affiliates in order to ensure an adequate level of protection for your Personal Data.

#### How Long Do We Retain Personnel Personal Data?

We store Personal Data about Personnel in accordance with local data retention policies, as required by applicable laws and/or in accordance with other internal compliance policies. We will retain your Personal Data 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), to 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.

Any personal data which has been anonymised or pseudonymised for the purpose of tracking the spread of the virus across our offices may be retained for longer for statistical purposes in order to assist internal management in reflecting on their response to the outbreak and to assist in preparing for any future outbreaks.

# What Are Your Rights and Options Concerning Personnel Personal Data?

Should you have any questions or comments about our processing of your Personal Data, please contact us using the details provided 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. To the extent required by applicable law, you have the following rights:

1. You have the right to correct, update, access, receive or delete your Personal Data. If you wish to do so, please first try using any self-service applications to which you have been granted access.

2. You can object to the processing of your Personal Data and 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 required by law or internal compliance.

3. 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.

4. 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.

# How to Contact Us.

If you wish to exercise your rights with regard to your Personal Data and you cannot gain access through selfservice 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 following mailbox: DSRHREMEA@Conduent.com

For other questions or comments about this Notice, or Conduent's workforce Personal Data handling practices, and for any other reasons concerning workforce data protection, you may contact our European Data Protection Officer at:

# Fieldfisher LLP ConduentDPO@Conduent.com

**Controller** The Conduent entity directly employing you is generally the **controller** of your Personal Data. Occasionally, that direct employer entity may transfer your Personal Data to other Conduent entities so they may use it as a controller. For instance, Conduent Business Services, LLC, a business entity headquartered in the United States of America will likely process your Personal Data as a co-controller of your information with your direct employer.

## 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, and otherwise as may be required by applicable law.

Dated: October 2024