

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 behavior 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 work space 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
<p>Personnel Administration: General personnel administration including allocation of work, performance reviews, promotions, succession planning, staffing, work management, processing business travel arrangements, managing leave requests, health and wellness programs, recreation, meals and dietary restrictions, accommodations and related requests, or otherwise.</p>	<p>Your contact details including your name, business and personal address, work phone number (including company owned and issued cell phone and/or where allowed and where you may consent to provide it, your personal cell phone number used for work), work email, date and place of birth, gender, marital status, personal details of dependents and emergency contact</p> <p>Information on your employment with Conduent including description of current position, hire date, termination date, supervisor(s), direct reports, employee identification number, information system identification number(s), employment status and type, terms of employment, employment contract, work and education history, retirement eligibility, promotions, performance review information – including goals and assessments, training, and disciplinary events, grievance procedures, leave request and/or grant information, sickness/holiday and working time records. Details of your hobbies and interests.</p> <p>Information on physical health conditions, allergies and dietary requirements</p> <p>Citizenship, residency, work permit identifiers and immigration information.</p>	<ul style="list-style-type: none"> Contractual necessity Legitimate interests of managing its workforce and staff planning <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> 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; or Where the processing is necessary for the purpose of establishing, making or defending legal claims.
<p>Recruitment and hiring process</p>	<p>Your contact details including your name, personal address, contact phone number, email address, date and place of birth, gender, marital status.</p> <p>Information concerning your application and our assessment of it, details contained in letters of application and resume/CV, work and education history, professional references, professional qualifications, language proficiency and other relevant skills, any checks we may make to verify information provided or background checks and any information connected with your right to work, citizenship, residency, work permit identifiers, immigration information and banking details. Your application may also include details of your hobbies and interests.</p> <p>Records of our decision making process in relation to your application.</p> <p>If relevant, and to the extent required or permitted by local law, we may also</p>	<ul style="list-style-type: none"> Contractual necessity Legitimate interests for recruitment purposes <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> 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; or where the processing is necessary for the purpose of establishing, making or defending legal claims.

Purpose	Personal data that may be processed	Grounds for processing
	process information concerning your health, any disability and in connection with any adjustments to working arrangements.	
Training and development: Administering training and workforce learning and development; providing compliance training, learning, seminars, and awareness programs (including improving and developing our training materials for employees and our policies and procedures through surveys, questionnaires and feedback)	<p>Your contact details including your name, contact phone number, email address.</p> <p>Information on your employment with Conduent including description of current position, supervisor(s), direct reports, employee identification number, information system identification number(s), employment status and type.</p> <p>Performance review information – including goals and assessments, training, attendance records.</p>	<ul style="list-style-type: none"> Contractual necessity Legitimate interests of developing the skillset of the Conduent workforce, maintaining records of such training and performance.
Administering your contract including entering it, performing it and changing it. This may include background checks including criminal records searches, where and as allowed by applicable law.	<p>This includes your contact details (i.e. your phone number, address and email address) and identification data (including name or alias, gender, national identity document number, tax registration number, social security information and other details in identity documents (Conduent may also collect copies of such IDs)).</p> <p>Information on your terms of employment (e.g. description of current position, promotions, performance information (including goals and assessments, training, and disciplinary events), hire date and termination date), employment status and type or engagement from time to time including your pay and benefits (including pensions and savings plans, superannuation, stock grants/awards, bonuses, leave requests, insurance, or other employee benefits programs), your participation in pension arrangements, life and medical insurance and any bonus or share scheme.</p> <p>If relevant, and to the extent required or permitted by local law, we may also process information concerning your health, any disability and in connection with any adjustments to working arrangements.</p>	<ul style="list-style-type: none"> Contract Legal obligations Legitimate interests of running the Conduent business effectively <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> 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; or where the processing is necessary for the purpose of establishing, making or defending legal claims.
Payroll administration including administration of benefits, pensions payments, trade union memberships.	<p>Your contact details including your name, contact phone number, email address.</p> <p>Information required to pay you including your hire date, termination date, description of current position, bank account details, salary, pension contributions and details of other</p>	<ul style="list-style-type: none"> Contract Legal obligation Legitimate interests to maintain records and details to support payroll and

Purpose	Personal data that may be processed	Grounds for processing
	<p>benefits (including savings plans, superannuation, stock grants/awards, bonuses, leave requests, insurance, or other employee benefits programs), beneficiary or participant details if provided for enrolment in benefits plans, retirement eligibility and information on tax and social security / national insurance.</p> <p>Information on attendance, work time records, leave request and/or grant information, holiday and other leave and sickness absence.</p> <p>Citizenship, residency, work permit identifiers and immigration information.</p>	<p>benefits information and budget planning</p> <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> • 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; or • where the processing is necessary for the purpose of establishing, making or defending legal claims.
Financial management and budgeting	<p>Information about your role with Conduent including your contact details including your name, contact phone number, email address, job title/position, hire date, termination date, retirement eligibility, remuneration and promotion information to analyze 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.</p>	<ul style="list-style-type: none"> • Legal obligation • Legitimate interests of Conduent
Business analytics and management reporting	<p>Aggregated information as listed in this privacy notice to track headcount and attrition of employees</p>	<ul style="list-style-type: none"> • Legitimate interests of running the Conduent business effectively
Supporting and managing your work and performance and any health concerns	<p>Your contact details including your name, contact phone number, email address.</p> <p>Information connected with your work, anything you do at work and your performance including records of documents and emails created by or relating to you and information on your use of our systems including computers, laptops or other devices.</p> <p>Management information regarding you including notes of meetings and appraisal / performance records.</p> <p>Information relating to your compliance with our policies.</p> <p>Information concerning disciplinary allegations, investigations and</p>	<ul style="list-style-type: none"> • Contract • Legal obligation • Legitimate interests of running the Conduent business effectively <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> • 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 is necessary for the purpose

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	<p>processes and relating to grievances in which you are or may be directly or indirectly involved.</p> <p>To the extent required or permitted by local law, information concerning your health, including self-certification forms, fit notes and medical and occupational health reports.</p>	<p>of establishing, making or defending legal claims; or</p> <ul style="list-style-type: none"> where the processing relates to data about you that you have made public.
<p>Changing or ending your working arrangements</p>	<p>Your contact details including your name, contact phone number, email address.</p> <p>Information connected with anything that may affect your continuing employment or the terms on which you work including any proposal to promote you, to change your pay or benefits, to change your working arrangements or to end your employment, e.g. hire date, termination date, retirement eligibility, promotions, performance review information (including goals and assessments, training, and disciplinary events) and medical or other leave supporting information.</p>	<ul style="list-style-type: none"> Contract Legitimate interests of running the Conduent business effectively <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> 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; or where the processing is necessary for the purpose of establishing, making or defending legal claims.
<p>Maintaining the security of our premises, systems, staff and visitors including monitoring the use of such resources.</p>	<p>Your contact details including your name, contact phone number, email address.</p> <p>Security and access data including access card log data and CCTV at our premises, photographs and audio-visual recordings, fingerprint data, building entry / exit data where required to access certain systems (to the extent permitted by law and required by your specific role)</p> <p>Where you drive to our offices, we might collect vehicle data including license plates and document this data in our records</p> <p>To the extent required or permitted by local law, information regarding your use of IT resources, tools and equipment provided by Conduent including IP addresses, network identification data, activities conducted on Conduent's IT applications and systems, data usage, cookies, device IDs, web browsing history, etc.</p>	<ul style="list-style-type: none"> Legal obligation Legitimate interests (specifically to ensure the security of Conduent systems, premises and staff) <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> 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; or where the processing is necessary for the purpose of establishing, making or defending legal claims.

Purpose	Personal data that may be processed	Grounds for processing
Providing references in connection with your finding new employment	<p>Your contact details including your name, contact phone number, email address.</p> <p>Information on your working for us and on your performance, e.g. promotion information, employment status and type, performance review information (including goals and assessments, training, and disciplinary events).</p>	<ul style="list-style-type: none"> • Consent • Legitimate interests of data subjects, Conduent and third parties in respect of workforce migration
Providing information to third parties in connection with transactions that we contemplate or carry out	<p>Your contact details including your name, contact phone number, email address.</p> <p>Information on your contract and other employment data that may be required by a party to a transaction such as a prospective purchaser, seller or provider of outsourced services (e.g. during mergers, acquisitions, re-organizations, sales, or business divestitures).</p> <p>This would also include customer tenders, business process execution and support including providing key contact and other details of support staff, delivering products and services, responding to customer questions, providing customer support and sharing news and updates about Conduent products and services.</p>	<ul style="list-style-type: none"> • Legitimate interests of Conduent to allow it to run its business effectively
Monitoring of diversity and equal opportunities	<p>Your contact details including your name, contact phone number, email address.</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"> • Legitimate interests of Conduent to ensure diversity of its workforce and equal opportunities for employees • Consent • Public Interest <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> • 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; or • where the processing is necessary for the purpose of establishing, making or defending legal claims.

Purpose	Personal data that may be processed	Grounds for processing
Monitoring and investigating compliance with policies, standards and procedures, rules and other legal requirements (generally and specifically) including investigations, dealing with complaints and whistleblower reporting, vetting people against compliance lists where required by applicable law, conducting audits, compliance with government inspections.	<p>Your contact details including your name, contact phone number, email address.</p> <p>We expect our staff to comply with our policies and rules and may monitor our systems to check compliance. We may also have specific concerns about compliance and check system and other data to look into those concerns (e.g. log in records, records of usage and emails and documents, CCTV images, photographs and audio-visual recordings and data collected for access including swipe card records, entry and exit records).</p> <p>Information collected in connection with an investigation into compliance, such as description of the alleged misconduct, witness statements and evidence gathered to ascertain the facts and circumstances.</p> <p>Conclusions of the investigation.</p>	<ul style="list-style-type: none"> Legitimate interests of Conduent to monitor compliance with its law, policies and procedures
Monitoring work processes electronically and/or physically	<p>Your contact details including your name, contact phone number, email address.</p> <p>Information about your employment including access rights, role, work products.</p> <p>Information regarding your use of IT resources, tools and equipment provided by Conduent, CCTV, swipe card records, building entry / exit data where and to the extent allowed by applicable law.</p>	<ul style="list-style-type: none"> Legitimate interests to monitor use of systems and processes to ensure effective and compliant use
Administering the use of information technology resources such as phones and electronic devices, software applications, global directory listings, files, electronic communications, and hard-copy materials and other employee business resources	<p>Information to contact you including your name, work and personal contact details.</p> <p>Information regarding your use of IT resources, tools and equipment provided by Conduent including IP addresses, network identification data, activities conducted on Conduent's IT applications and systems, data usage, cookies, device IDs, web browsing history, etc.</p>	<ul style="list-style-type: none"> Legitimate interests of Conduent to manage its resources effectively, and planning purposes
Disputes and legal proceedings	<p>Any other information relevant or potentially relevant to a dispute or legal proceeding affecting us.</p> <p>This includes any information we have generated via investigations, our</p>	<ul style="list-style-type: none"> Legitimate interests of Conduent to deal with such disputes and proceedings Legal obligation <p>In relation to Sensitive Personal Data, where the processing is</p>

Purpose	Personal data that may be processed	Grounds for processing
	whistleblowing hotline and monitoring of our systems.	necessary for the purpose of establishing, making or defending legal claims.
Day-to-day business operations including marketing, customer/client relations, support and service customers, providing news and updates on Conduent products and services.	<p>Any other Information relating to the work you do for us, your role and contact details including relations with current or potential customers or clients. This may include a picture of you for internal or external use and promotional photographs (for example to be included in brochures, on our corporate websites, for display at events or in bids for client work) or audio-visual recordings.</p> <p>Information used on global or local internal or external directories to identify what you do and how you can be contacted (to enable collaboration with colleagues and others).</p> <p>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.</p>	<ul style="list-style-type: none"> Legitimate interests of Conduent for the running of its business, marketing services and providing products/services to clients
Maintaining appropriate business records during and after your employment or engagement	<p>Your contact details including your name, contact phone number, email address.</p> <p>Information relating to your work, anything you do at work and your performance relevant to such records.</p>	<ul style="list-style-type: none"> Contract Legal obligation Legitimate interests to run and maintain its business effectively
Emergency medical treatment	<p>Your contact details including your name, contact phone number, email address.</p> <p>Information on any physical or mental health conditions.</p> <p>Any other information required to notify your close contact(s) of any incident at or in connection with work and to allow responsible people to administer emergency medical treatment, e.g. personal details of dependents or emergency contacts,</p>	<ul style="list-style-type: none"> Vital Interests <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> 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; or where the processing is necessary for the purpose of establishing, making or defending legal claims.
Communications and Emergencies	Your contact details at both home and work so we can facilitate communications at the workplace location, home and when individuals	<ul style="list-style-type: none"> Legal obligation

Purpose	Personal data that may be processed	Grounds for processing
	<p>are traveling, 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"> • Legitimate interests of Conduent to ensure safety and wellbeing of staff • Vital interests <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> • 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; or • where the processing is necessary for the purpose of establishing, making or defending legal claims.
<p>Whistleblowing and/or reports to our whistleblowing hotline</p>	<p>If you make a report to our hotline, we will process:</p> <ul style="list-style-type: none"> - voice recordings where you make a report to our telephone hotline - contact details (including your employment details) - content of communications when you communicate with us through the Hotline or in communications such as email exchange or interview in relation to an investigation. <p>Other information we may process in the context of an investigation is:</p> <ul style="list-style-type: none"> - Your contact details including your name, contact phone number, email address - Information about your employment including access rights and role <p>Information regarding your use of IT resources, tools and equipment provided by Conduent, CCTV, swipe card records, building entry / exit data where and to the extent allowed by applicable law.-</p> <ul style="list-style-type: none"> - communications data, documents and chats held on our or third party IT systems and devices - To the extent required or permitted by local law, information regarding your use of IT resources, tools and equipment provided by Conduent 	<ul style="list-style-type: none"> • Legal obligation including its duties as an employer. In the EU, the relevant laws are the Directive (EU) 2019/1937 on the Protection of Persons Who Report Breaches of Union Law as transposed into national law. In the UK, the relevant laws are the Public Interest Disclosure Act 1998 and Employment Rights Act 1996. • Legitimate interests of investigating, and remedying conduct that may be harmful to us or others, including where it exposes us to civil or criminal liability or violates our codes of conduct or employee policies and procedures. <p>In relation to Sensitive Personal Data:</p> <ul style="list-style-type: none"> • Where the processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law;

Purpose	Personal data that may be processed	Grounds for processing
	<p>including IP addresses, network identification data, activities conducted on Conduent's IT applications and systems, data usage, cookies, device IDs and web browsing history</p> <p>- CCTV footage and swipe card logs of individuals on our premises</p> <p>In addition, if a report is made about you or which refers to you, this could include personal data about yourself and other individuals such as those that have engaged in alleged misconduct, including (alleged) criminal activity or who have witnessed such activities.</p> <p>Following a report or investigation, we may also process this data for HR administration purposes, such as to provide support, training or take disciplinary action.</p> <p>Note that in the case of a finding that criminal activity has or is likely to have taken place we may further process personal data for the purpose of legal proceedings and share personal data with law enforcement or other regulatory bodies and courts.</p>	<ul style="list-style-type: none"> Where the processing is necessary for reasons of substantial public interest.

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 to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights. For example, bank details used to pay salaries and benefits.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work, tax/audit obligations and avoiding unlawful discrimination.
Legitimate interests	Processing necessary for our or a third party's legitimate interests	<p>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.</p> <p>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.</p>

Term	Ground for processing	Explanation
Consent	You have given specific consent to processing your data	In general, processing of your data in connection with employment will not be conditional on your consent. But there may be occasions where we do specific things such seeking to monitor diversity or providing a one-off voluntary benefit and rely on 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 data will not be processed on this ground, but there may be some limited instances, for example, for diversity and inclusiveness monitoring purposes. 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 current 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.

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, whistleblowing hotline provider.

Lastly, we may also share your Personal Data with investigators, external legal advisers and 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 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 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: August 2025