

## Data Privacy

**Effective Date:** March 1, 2021

We respect and are committed to safeguarding the confidentiality, data privacy and security of the information that our customers have entrusted to us, including the confidential information, personally identifiable information, proprietary information and trade secrets gathered across all of our business operations.

Conduent's commitment to data privacy goes beyond the minimum legal and regulatory requirements and strives for best-in-class data protection and privacy management. This commitment is overseen at the executive level by the Chief Privacy Officer who reports to the General Counsel and the Chief Information Security Officer who reports to the Chief Information Officer (with the GC and CIO both reporting directly to the Chief Executive Officer of the company.) The board receives quarterly reports or a read only report. The Audit Committee agenda includes coverage of data privacy at every Board Meeting

Conduent ensures our employees and contractors are educated and trained on the company's data privacy policies throughout their tenure, including new-hire instructions and annual trainings.

### **Conduent Online and Third Party Privacy Policy**

View our online privacy policy covering the websites that belong to Conduent and how we handle website interactions, as well as personal data we process about other individuals who Conduent keep in contact with.

### **Introduction**

This privacy notice applies to the personal data collection, use, and disclosure practices of Conduent and its affiliated entities ("Conduent", the "Company", "we", "us", "ours") pertaining to Conduent websites where this notice is displayed. It also applies to the collection, use and disclosure of information that we collect about our contacts, such as our vendors, clients and those who make enquiries to us. This notice does not apply to our employee personal data or candidate recruiting practices. Please refer to other privacy notices pertaining to those activities. This notice does not cover the privacy practices relating to personal data collected through websites of Conduent subsidiaries or affiliates who publish their own policies different from this notice.

Where the concept of "controller" and "processor" apply under applicable law, the Conduent entity collecting your personal information through this website is deemed a controller (having discretion about the uses of your personal information). The controller may transfer your personal information to Conduent affiliates and others as provided in this notice. Those other entities may be deemed joint-controllers or processors depending upon the purposes for which your personal information is disclosed to them.

### **Privacy Complaints and Inquiries**

Conduent commits to resolve complaints about your privacy and our collection or use of your personal information. Inquiries or concerns regarding this privacy policy or Conduent's data handling practices should be directed to the relevant data protection office detailed below.

#### **The Philippines**

Ronald Jomocan  
Data Protection Officer  
[Ronald.jomocan@conduent.com](mailto:Ronald.jomocan@conduent.com)

#### **European Union European Economic Area United Kingdom**

Fieldfisher LLP  
Data Protection Officer  
[ConduentDPO@conduent.com](mailto:ConduentDPO@conduent.com)

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### All other countries

Brian Clayton  
Chief Privacy Officer  
Conduent Business Services,  
LLC  
100 Campus Drive  
Florham Park, NJ 07932, USA  
O: +1 (856) 651-2814  
[Brian.Clayton@conduent.com](mailto:Brian.Clayton@conduent.com)

You can also contact us if you have privacy enquiries or concerns through the Conduent Business Ethics and Compliance Office. To report your inquiries or concerns to the Business Ethics and Compliance Office please contact the Conduent Ethics Helpline. The Conduent Ethics Helpline is confidential and anonymous, if you so desire, and is available online and via a toll-free number listed below.

- Web Reporting: [conduent.com/ethicshelpline](https://conduent.com/ethicshelpline)
- US & Canada Toll-Free Number: 1-844-330-0221.
- Direct Dial Toll-Free Numbers Outside US & Canada available at [conduent.com/ethics](https://conduent.com/ethics). You may also contact us via postal mail at:

Conduent Incorporated  
Business Ethics and Compliance Office  
100 Campus Drive, Suite 200  
Florham Park, NJ 07932  
USA

### Collection of Personal Information

#### **Website users**

You may choose to give us personal information online such as to allow us to communicate with you or provide you with services. Our online forms asks for relevant information, such as name, email, street address, and phone number. If you make a purchase, we may ask for your credit card number and billing information. We may also collect information about your visits to our **websites, including your Internet Protocol (IP) address, browser type and language, location** information and details of your browsing patterns. This is more fully described under the section entitled “Cookies, Web Beacons and AdChoices” below. We collect this information to determine such things as the number of visitors to various parts of our websites and to personalize your experience on our sites, and tailor our interactions with you.

If you do not want to give personal information to Conduent online you may communicate with us through the postal addresses or the phone or fax numbers that we also provide on our websites or in this Notice. This website is not directed toward children under 13 years old. Conduent does not knowingly collect personal information from minors under the age of 13. Where required in accordance with applicable law, Conduent will provide other and further notices, and collect such express consent, as may be deemed appropriate relating to individuals who may be over 13, and may use specific websites.

Personal information that is submitted in a business capacity may be merged with available business data base directories.

***Our contacts***

You may choose to give us personal information to allow us to establish and manage our relationship with our customers, service providers, and other partners. This may include information such as your name, email, street address and telephone number. Depending on how we interact with you, you may also provide us with your employment details such as employer and job title, and also financial information such as your bank account details.

In addition we may correspond with you and that may contain certain personal data that we exchange in the ordinary course of business such as to schedule meetings and calls, or to obtain services from you or your employer.

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

From time to time, we may receive personal information about you from third party sources (including from your employer and on occasion other suppliers and partners), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

**Why Does Conduent Collect Personal Information?**

Conduent maintains the information it receives online in strict confidence. Personal information you submit to Conduent is not sold to or shared with third parties, except our subsidiaries, affiliates, agents and partners as described in this policy.

Conduent reserves the right to notify you about administrative matters that pertain to your Conduent products or services. We may disclose your personal information as required by law or regulation, in connection with law enforcement, fraud prevention, or other legal action, or if Conduent reasonably believes it is necessary to protect Conduent, our customers, or the public. In the event of a merger or acquisition of one, or more, Conduent affiliates or a substantial portion of its assets, Conduent may disclose, transfer or sell personal information collected online as needed to assess such transactions and to the surviving or acquiring party, respectively. Personal information collected online will remain subject to promises made in this notice.

If you would like to contact us without submitting personal information through this website, you can reach a Conduent representative by calling 1-844-ONE-CNDT (1-844-663-2638).

As related to personal information collected through this website, in addition to the purposes otherwise discussed in this notice, we use personal information submitted through this site for a limited purpose, and only to:

- respond to your questions;
- provide customer support;
- share news, updates, or helpful tips about Conduent products and services;
- inform you of special promotions;
- sign up for online services;

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- customize, analyze, and improve our products, services, technologies, communications and relationships with you; and
- deliver products and services requested by you;
- obtain products and services requested by us;
- protect our legal rights to the extent authorized by applicable law;
- provide security mechanisms and fraud control measures to the extent authorized by applicable law; and
- protect the rights and vital interests of you and other people.

### Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so, for example responding to your queries or providing you with a service you have requested. Note that we may need to retain personal information for longer periods to comply with applicable legal, tax or accounting requirements.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

### Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will process personal information about you only:

- where we need the personal information to perform a contract with you, for example when you request services from us
- where the processing is in our legitimate interests and not overridden by your rights, for example when we respond to your queries, improve our website, provide security mechanisms and fraud control measures or in the context of providing or receiving services or for the purpose of the collaboration or partnership
- where we have your consent to do so (with consent defined as a specific, informed and unambiguous indication of your wishes to the processing of your personal data)
- where we have a legal obligation to collect personal information from you, for example in relation to financial or tax matters
- where, in rare cases, it is necessary to protect the health or wellbeing of another person

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

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

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

**Communication Preferences, Sharing and User Generated Content**

Conduent may send commercial email to you advertising our products and services. You can also subscribe to various product and service-specific communications on our websites. If you receive direct marketing email from Conduent and wish to discontinue these mailings, you may unsubscribe at [www.conduent.com/unsubscribe](http://www.conduent.com/unsubscribe), and/or in any unsubscribe opt-out method provided in the communications.

You may also mail an unsubscribe request to:

Marketing Privacy Preferences  
Conduent  
100 Campus Drive, Suite 200  
Florham Park, NJ 07932  
USA

Where allowed by applicable law, the unsubscribe options provided to you may not apply to communications primarily for the purpose of administering order completion, contracts, support, product safety warnings, software updates where you are provided with appropriate choice in accordance with applicable law, or other administrative and transactional notices, the primary purpose of which is not promotional in nature. This means that even if you opt-out of receiving direct marketing communications, we may still need to retain some of your personal information necessary to communicate with you on these topics where required for these purposes.

Conduent does not share your personal information obtained through this site for the purpose of third-party direct marketing.

If you are a California resident under the age of 18, and a registered user of any sites where this notice is posted, California Business and Professions Code Section 22581 permits you to request and obtain the removal of content or information you have publicly posted, if the site allows public postings. To make such as request please send an email to the How to Contact Us section for subject access rights requests. To make such a request, please provide a detailed description of the specific content or information for which you seek removal. Please note such a request may not ensure complete or comprehensive removal of the content you may have posted and that there may be circumstances where the law does not require or allow removal even if requested.

**International Transfers of Personal Information**

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 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) 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; (iv) we have your specific consent (where required by applicable law for the type of data); (v) 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 recognized international legal requirements.

### **Security of Personal Information**

Conduent uses technical, organizational, and physical measures designed to protect the integrity, confidentiality, security, and availability of personal information. Among other measures, only authorized personnel of Conduent and of our third party service providers with a legitimate need to know are provided access to personal data, and these employees and third party service providers are required to treat this information as confidential where applicable and in compliance with Conduent's policies. Despite these precautions, we cannot guarantee that unauthorized persons will not obtain access to your personal data.

If you arrange for services through this website, it may be necessary for us to transfer your personal information to our affiliates or third-parties for the purposes of their assisting us with fulfilling the services.

### **Your Rights**

If you are a resident in the European Economic Area or another country where similar rights may apply, you may have certain rights such as:

You may have a right to **access, correct, update or request deletion** of your personal information. If you have such right, you can do so by contacting us using the contact details provided under the "How to contact us" heading above.

In addition, you may be able to **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. You can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading above.

You may have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing communications we send you. To opt-out of marketing generally, please contact us using the contact details provided under the "How to contact us" heading above.

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

You have the right (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to request access to your personal data and obtain information on and a copy of that personal data. You may request a rectification of that data if it is inaccurate or incomplete.

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.

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Where legally required, you have the right to be notified of any suspected breach of your Personal Data. We have put in place procedures to deal with any suspected breach of Personal Data and will notify you and any applicable regulatory body of a Personal Data breach where we are legally required to do so.

Conduent routinely processes significant volumes of data (including PII and PHI) for a broad, diversified global customer base. Accordingly, we are periodically subjected to unauthorized attempts to compromise or acquire data. To protect Conduent and our customers, we do not broadly disclose specifics regarding these attempts other than in instances where we are legally required to do so. We maintain an information security program that is aligned with broadly accepted and highly regarded frameworks including NIST, HITRUST, HIPAA, ISO and PCI standards as well as applicable industry regulatory requirements. The program is **continuously reviewed and strengthened as necessary to ensure responsiveness to and protection** against actual and emerging threats.

**We respond to all requests we receive from individuals wishing to exercise their data protection** rights in accordance with applicable data protection laws.

### Data Security Risk Approach

Conduent's security program is aligned with applicable industry regulatory requirements, including but not limited to NIST, HITRUST, GDPR, HIPAA, ISO, and PCI. The program encompasses information security and cyber operations capabilities that protect Conduent and our clients. It is continuously reviewed and strengthened as necessary to ensure responsiveness to and protection against emerging threats.

Conduent maintains a highly qualified workforce and utilizes external experts to support the program. We administer internal education, training, and communication programs to ensure ongoing awareness and vigilance. We maintain and communicate formal documented policies and standards. We monitor and assess the overall operating effectiveness of our program through risk assessments that include identification and remediation of vulnerabilities and threats. We maintain and test our cyber incident response plan, and undertake various independent reviews in conjunction with PCI DSS, external audits, internal audits and client assurance efforts. Various additional operational protections, controls and processes exist, including but not limited to malware protection, intrusion prevention and detection protocols, user access reviews, network segmentation, implementation and maintenance of network and application firewalls, vulnerability scanning, data encryption, penetration testing and patching.

## Cookies, Web Beacons and Privacy Choices

### What is a browser cookie?

Cookies are pieces of information that may be loaded to your browser or device when you visit a website. These types of cookies may involve our submitting information to you or receiving information from you to us, or may involve transmitting information directly to another third-party from our website. Depending upon the browser or setting you use, you can choose to have your device warn you when cookies are being sent, you may block certain cookies, or block cookies altogether. If you turn off all cookie functionality some of the features on our websites may not function properly.

### How does Conduent use cookies?

Conduent uses cookies to recognize repeat visits to our websites and to facilitate navigation and online shopping. The cookies store your country and language, along with an assigned random session ID. In some cases, the cookies store name and address information so you do not have to re-enter this information in multiple forms.

The cookie information that Conduent collects helps us track the number of visitors to our websites over time and determine whether these were new or repeat visits.

Conduent also works with third party advertising partners that use cookies to deliver Conduent advertising on other websites and to measure the performance of our advertising campaigns.

We use several categories of cookies and each performs different functions. You can learn more about cookies and their functions generally by visiting website such as [allaboutcookies.org](http://allaboutcookies.org).

**What is a Web Beacon?**

A web beacon is an electronic image that can be used to recognize a cookie on your computer or other device when you view a web page or open an email message.

**How does Conduent use Web Beacons?**

Where allowed by, and consistent with, applicable law Conduent and our third party advertising partners may use web beacons on our websites, in our emails, and in our advertisements on other websites to measure the effectiveness of our websites and our advertising. For example, web beacons may count the number of individuals who visit our websites from a particular advertisement or the number of individuals who open or act upon an email message.

**Can I block cookies and web beacons?**

Yes, the ability to enable, disable or delete cookies can be controlled through your website browser and where otherwise provided in certain locations, through our website technology including pages advising you of the use of tracking technologies and seeking consent, where required, to our use of those technologies. Consult the "Help" menu of your browser application for details, or follow details on webpage notices. Where required by applicable law, Conduent will honor do not track signals sent from browsers where it is clear a user has made individual consent to block tracking technologies. If you block the use of cookies, that may impact the use of some of the features on certain Conduent websites. You can make some web beacons unusable by disabling cookies.

**Links to non-Conduent websites.**

Other websites that may be accessed through our website, such as through social media buttons or other links, may collect certain information about you through the use of cookies, web beacons and other features. We do not have access to or control over the cookies or other features that these third party sites may use, and the information practices of these third party websites are not covered by this notice. Please contact them directly for more information about their privacy practices.

**Privacy Choices: How does Conduent use Interest-Based Advertising?**

Websites cooperate with online advertisers to collect information about visitors to present ads that are more useful and relevant. This is known as interest-based advertising or online behavioral advertising. Conduent and our third party advertising partners may use cookies and web beacons to deliver interest-based ads that are relevant and targeted to our customers and prospects.

**What information do Conduent websites collect for interest-based advertising?**

Conduent and our third party advertising partners may use cookies or web beacons to collect information for the purposes of interest-based advertising based on your visits to [Conduent.com](http://Conduent.com) and other web sites. These cookies identify the pages you view, the links and ads you click on, other actions you take on those websites, and the referring website. Similarly, online advertisers use cookies to deliver advertising to you for companies other than Conduent based on your visits to [Conduent.com](http://Conduent.com) and other websites. When delivering interest-based ads, Conduent adheres to the Self-Regulatory Program for Online Behavioral Advertising.



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Yes, Conduent provides [a tool to opt-out of data collection](#) by companies that adhere to [the Self-Regulatory Program for Online Behavioral Advertising](#). Where applicable, we also provide methods for express consent to load cookies that are not strictly necessary for website operation purposes.

**Policy Updates**

Conduent reserves the right to make changes to this policy. If we make changes, we will revise this Online Privacy Policy to reflect such changes and revise the effective date of the policy.