



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

This notice explains how Conduent Business Services, LLC group companies located in EMEA (including the European Union, Switzerland, Turkey and the UK) ("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 EMEA which are subject to EMEA data protection laws by virtue of either monitoring the behaviour of Personnel in EMEA (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-EMEA group entities as well as all EMEA 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.

For more detail on how Conduent processes and protects Personal Data of Personnel please see the [Global Employee and Personnel Privacy Notice](#)

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

As part of managing Personnel, we process various types of Personal Data such as 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, photographs and audio-visual recordings, CCTV images, personal details of dependents, emergency contacts, beneficiary or participant details if provided for enrolment in benefits plans, citizenship, residency, work permit identifiers, immigration information, banking details, work time records, leave request and or grant information, hire date, termination date, payroll information, benefits information, insurance information, health data, medical or other leave supporting information, description of current position, 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, details contained in letters of application and resume/CV, professional references, professional qualifications, language proficiency and other relevant skills, performance review information – including goals and assessments, training, and disciplinary events.

Where it is relevant to your employment, we sometimes 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. 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.

Where permitted by local legislations, to help safeguard the health, safety and well-being of all our Personnel and visitors Conduent collect certain personal data connected with the prevention and management of risks relating to COVID-19. For this purpose we may collect your name, surname, job title, location, confirmation of a positive or negative Covid diagnosis as well as information as to whether you are subject to quarantine or isolation requirements. We may also take your body temperature on entry to the site, but we will not record the numerical temperature readings.

#### ***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.

#### ***What is the Lawful Basis of Processing your Personal Data? (Page 2)***

We process your Personal Data and Sensitive Personal Data:

1. to perform and manage the employer/employee or subcontracting relationship (for example bank details used to pay salaries and benefits)
2. to protect your vital interests (such as when collected and used for health and emergency contact information)
3. for legitimate interests of the business (such as business contact details used to contact and communicate with you)
4. where there is a legal requirement to do so (for example our tax and audit obligations).
5. to (i) uphold the substantial public interest, or (ii) protect 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).
6. for which your specific, express consent may be requested.

In that event you will receive additional disclosure notices for the various uses or systems and you will be given the opportunity to voluntarily grant your consent. You will be informed of the consequences of not providing such consent.

#### ***The Purposes of Processing Personal Data (page 2)***

Most of your Personal Data is processed for various reasons including the following:

#### **Personnel Administration**

- Managing the work activities of Personnel generally including appointments or removals, performance reviews, promotions, succession planning, administering salary and expense processing, discipline, 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.
- Administering training and workforce learning and development; providing compliance training, learning, seminars, and awareness programs.
- Administering benefits including pensions and savings plans, superannuation, stock grants/awards, bonuses, leave requests, insurance, or other employee benefits programs.
- Improving and developing our training materials for employees and our policies and procedures through surveys, questionnaires and feedback.
- Carrying out intracompany motivational activities to improve employee engagement such as acknowledging your professional achievements and special anniversaries of the date you joined Conduent.

#### **Marketing**

- Promoting Conduent, such as through promotional photographs, and audio-visual recordings.
- Promoting offers and services to employee that are made available by Conduent including by its service providers on behalf of Conduent[, such as promoting online learning services]. In some cases we or our providers may track whether promotional emails have been received, when and how often they are opened, how long they are viewed and from what device or IP address and in what location. This information is useful to help analyse the success of promotions and improve future promotions.

#### **Compliance**

- Conducting investigations, receiving and administering complaints, ethics reporting administration (which could include whistleblower reporting), disciplinary actions and measures.
- Vetting people against compliance lists where required by applicable law.
- Complying with policies, collective bargaining agreements, and legal requirements, such as tax deductions, record-keeping and reporting obligations (including for health, benefits, anti-discrimination compliance), conducting audits, compliance with government inspections and other requests from government or other public authorities, handling legal processes and managing any internal complaints.
- Monitoring compliance with Conduent's internal policies, standards and procedures

#### **To support and service our customers**

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.

#### **Security**

- To monitor technical resources and use of those resources for security purposes.
- To manage and safeguard physical security and access (via access cards and CCTV) to Conduent infrastructure, premises, assets and office equipment, including for the prevention of criminal activity.

#### **Communications and Emergencies**

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

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

- Administering the 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.

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

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

#### **For financial management and budgeting**

- 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.

#### **Covid-19**

- Processing your absence from work or for well-being purposes, such as to reach out to you to check-in.
- Monitoring and taking steps to prevent the spread of COVID-19 and protecting our Personnel and visitors from infection.
- Administering appropriate levels of sick and other pay, monitoring sickness absence and providing appropriate support and guidance on a return to work.
- Data relating to Covid-19 may also be used on an aggregated basis for internal management purposes so that we can track infections across offices.

#### **For internal business analytics and management reporting.**

**To conduct background checks including criminal records searches, where and as allowed by applicable law.**

**To enable mergers, acquisitions, re-organizations, sales, or business divestitures.**

***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.

Where permitted by local legislations, personal data processed in connection with the Covid-19 pandemic may be shared within Conduent but access to it will be limited and on a need-to-know basis. This will predominantly be within the HR department, Corporate Security and if applicable, your direct line manager.

Data relating to Covid-19 may also be used on an aggregated basis for internal management purposes so that we can track infections across offices. *Your personal data may also be made available to medical entities or doctors if it proves necessary to fulfil our legal obligations or protect your vital interests*

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 your specific consent (where required by applicable law for the type of data); (iv) 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.

Generally, we will delete the information collected in relation to COVID-19 once the threat of the virus has passed, notwithstanding where any such information forms part of your HR absence record, in which case it will be retained in line with the principles set-out above. 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, in addition to any other rights which may apply under applicable local data privacy regulations:

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 learn more about the processing of your personal data, including purposes or list of recipients, 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: March 2022