

Global Associate Privacy Notice

INTRODUCTION

Cognizant is committed to handling the Personal Information of its associates in an appropriate and lawful manner. This Notice sets out the minimum requirements for ensuring that the Personal Information of associates is collected, used, retained and disclosed in a secure manner.

In some cases, local laws and regulations that apply to the Processing of Personal Information may be more restrictive than this Notice. Where this is the case, the more restrictive rules will apply.

This Notice is based upon the privacy principles set out in Cognizant's Global Data Privacy Policy.

APPLICABILITY

This Notice outlines how Personal Information of associates is collected, managed and processed by Cognizant. This Notice does not apply to Personal Information belonging to vendors, clients, customers of clients, or third party suppliers engaged in a legal relationship with Cognizant.

DEFINITIONS

- “Cognizant” means Cognizant Technology Solutions Corporation and its global affiliates and subsidiaries.
- “Personal Information” means any information relating to current, past and prospective employees and individual contractors of Cognizant which can be used to identify such persons, whether by use of that information alone or from that information in combination with other information in Cognizant’s possession. Personal Information may be stored electronically on a computer or other device, or in certain paper-based filing systems.
- “Sensitive Personal Information” includes information about an associate’s racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of or proceedings for, any offence committed or alleged to have been committed.
- “Process/Processed/Processing” means any activity that involves the use of Personal Information and may include collecting, obtaining, recording, retaining, holding, disclosing or transferring Personal Information.

COLLECTION, USE & DISCLOSURE

Cognizant will only collect Personal Information to the extent that it is required for the specific purpose or purposes, in the context of its business, as notified to associates. Where Cognizant wishes to use Personal Information for a new purpose that has not been notified to the associate, where required by law, Cognizant will notify the associate of the new purpose, and where necessary, obtain consent.

Cognizant will also notify associates of the choices and means, if any, that are offered for limiting the use and disclosure of Personal Information.

Cognizant will only collect Sensitive Personal Information where it is absolutely necessary in the context of its business.

Personal Information will only be made available to associates who have a business need to know that information.

The most common uses of Personal Information for Cognizant are:

- Determining eligibility for employment, including verification of references and qualifications;
- Administering pay and associate recognition programs in the nature of rewards, incentives and/or benefits;
- Processing work-related claims such as health or medical insurance;
- Conducting performance reviews;
- Developing resource plans to meet business demands.

Cognizant may also be called upon to disclose Personal Information of associates to third parties. Such situations may include the following:

- To comply with applicable employment or tax laws;
- To manage the corporate travel and/or corporate transfers of associates (whether in relation to an affiliate, client or third party supplier), including visa processing and disclosure for other immigration purposes;
- To conduct background verification and reference checks, administer benefits and payroll, deal with disciplinary and grievance issues and maintain emergency contact details;

- To share with customers for their evaluation before deployment on projects;
- To conduct business audits;
- For contingency planning in the event of business disruptions;
- For any other purpose reasonably required by Cognizant's business (subject to Cognizant's obligations under local law).

Where legally required, Cognizant will obtain associates' consent prior to disclosing their Personal Information to any third party.

Third party recipients of Personal Information may include the following:

- Customers;
- Suppliers and service providers;
- Professional advisers and consultants;
- Credit reference agencies;
- Employment and recruitment agencies;
- Central and State Government;
- Tax and social security authorities.

There may be circumstances where collection, use or disclosure may be justified or permitted, or where Cognizant is obliged to disclose Personal Information without associates' consent. These circumstances could include:

- Where the information is publicly available;
- Where Cognizant is required to do so by law or by order of a court or tribunal;
- Where it is alleged that an associate is guilty of a criminal offence, or is civilly liable in a legal action.

CONSENT TO PROCESSING

Cognizant will only Process Personal Information where it has a legitimate business need to do so and, where required by local law, with the associate's consent. Where Sensitive Personal Information is Processed, the explicit consent of the associate will be obtained where legally required.

Under local law, associates may be entitled to withdraw consent to the Processing of their Personal Information. Associates who wish to withdraw consent should write to their talent manager or local HR representative.

INTERNATIONAL DATA TRANSFERS

Due to the global nature of Cognizant's business, Personal Information may be shared, disclosed and transferred between the various Cognizant group companies where such transfers are required for legitimate business reasons.

Where Personal Information is transferred from a Cognizant company within the European Economic Area to one outside the European Economic Area, Cognizant will ensure that such transfer, and any subsequent onwards transfer, is afforded with an adequate level of protection in accordance with local law.

SURVEILLANCE CAMERAS

Where permitted by local law, Cognizant may monitor the activities of associates on Cognizant premises using CCTV, particularly where associates work in a client-controlled environment. All monitoring will be conducted in accordance with local law. Where required, signage will indicate which areas are subject to such monitoring. Recorded images are routinely destroyed, unless they are required for initiating disciplinary investigations or proceedings or are required for criminal or other investigations.

RETENTION

Cognizant will retain Personal Information for, at a minimum, as long as necessary for the purpose or purposes for which it was collected, according to local law.

SECURITY

All Personal Information collected, processed, stored, accessed, and/or handled is protected by industry standard security controls implemented globally across Cognizant.

Cognizant will ensure implementation of appropriate security measures designed to prevent unlawful or unauthorized Processing of Personal Information and accidental loss of or damage to Personal Information.

THIRD PARTIES

From time to time, Cognizant may use third parties to Process Personal Information. Cognizant will ensure that such third parties are subject to strict security requirements, conduct due diligence on such third parties and will conclude contracts with them setting out their obligations in relation to Personal Information, including Processing thereof. Cognizant requires that such third parties protect Personal Information against any loss, misuse or unauthorized access, disclosure, alteration or destruction, and implement security measures which are at least equivalent to those that Cognizant is required to implement under local law.

ACCURACY, ACCESS AND CORRECTION

Associates may verify and challenge the accuracy and completeness of their Personal Information and have it corrected, amended or deleted if appropriate. Cognizant systems allow associates to check and update certain Personal Information. It is the responsibility of all associates to ensure that their Personal Information is kept up-to-date. Cognizant will periodically remind associates to check their Personal Information to ensure that it is accurate, complete and current. Cognizant will take reasonable steps to ensure that Personal Information is reliable for its intended use.

Associates may request a copy of the Personal Information held about them by Cognizant by writing to their talent manager or local HR representative. A fee may be payable. Associates may request the amendment or deletion of inaccurate Personal Information by writing to their talent manager or local HR representative. Cognizant may require associates to provide reasons or evidence to justify the amendment of Personal Information held by Cognizant.

ENFORCEMENT

Cognizant is committed to monitoring and enforcing compliance with this Notice and with applicable privacy laws, regulations and obligations. Cognizant has documented procedures for:

- Addressing and resolving any data privacy grievance;
- Implementing a remediation process for any data privacy breach; and
- Identifying a third party arbitrator for dispute resolution, if necessary.

Cognizant conducts regular audits of its compliance with applicable privacy policies, procedures, laws, regulations, contracts and standards.

During compliance review, Cognizant:

- Documents the processes for resolution of issues and vulnerabilities, as well as corrective action plans;
- Records the results of compliance reviews and regularly submits material findings to the Audit Committee of its Board of Directors; and
- Follows up on recommendations for improvement/remediation plans based on the results of the compliance review.

INQUIRIES OR CONCERNS

Any questions, concerns or complaints about the operation of this Notice should be addressed to the relevant talent manager or local HR representative in the first instance.

If no response is received within 21 days, the matter may be escalated to the regional level Privacy Officers or any personnel authorized by the Chief Compliance Officer and Regional General Counsel. If no response is received within a further 14 days, the matter may be escalated to the Chief Compliance Officer by sending an email to privacy@cognizant.com.

In addition, associates may submit questions, concerns or complaints about Cognizant's privacy practices to the compliance helpline

(<https://www.compliancehelpline.com/welcomepagecognizant.com>).

SAFE HARBOR

Cognizant Technology Solutions U.S. Corporation and its US affiliates comply with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information from the European Union member countries and Switzerland. Cognizant Technology Solutions U.S. Corporation and its US affiliates have certified adherence to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. To learn more about the Safe Harbor program, and to view Cognizant's certification, please visit <http://www.export.gov/safeharbor/>.

NOTICE REVISIONS

Cognizant may update this Notice from time to time. Any such updates will be effective from the date on which they are notified to associates or posted on the One Cognizant portal. Associates should check this Notice from time to time to take notice of any changes made.