

Candidate Privacy Notification

This Notice describes how Capgemini Technology Services India Ltd, its subsidiaries and affiliate companies in India, including Aricent Technologies (Holdings) Limited, Altran Technologies India Private Limited & Global Edge Software Limited (collectively, “Capgemini”) handle and protect Candidate Personal Data, made available to Capgemini in the recruiting and employment process.

Capgemini will process Candidate Personal Data in accordance with this notice unless this notice conflicts with applicable law, in which case, applicable law will prevail.

Definitions:

<u>Candidate Data</u>	<p>Means personally identifiable information i.e. any information that relates to a person, which, either directly or indirectly, in combination with other information is capable of identifying such person.</p> <p><i>Candidate Personal Data includes a variety of information, such as Candidate work history, job data, education, skills, competencies, compensation, employer feedback, references, contact information, identity and address proof, photo, other/additional information provided by the Candidate (by a cover letter, CV or job application). Capgemini may also collect information relating to residential status, passport information as required for certain positions, capture image or screenshot of video calls for confirmation; and information collected pursuant to social media checks, credit checks, and criminal history checks as per applicable law.</i></p> <p><i>Candidates may, at their option, provide a copy of their Aadhaar as proof of identity and proof of address, which Capgemini is bound to accept. Candidates must be aware they have the option to provide alternate identity/address proof</i></p>
<u>Processing</u>	Means any action performed on the Candidate Data, such as collecting, recording, organizing, storing, transferring, modifying, using, disclosing, or deleting.
<u>Sensitive Candidate Data</u>	Means information relating to password, financial information such as bank account, credit card/debit card or other payment instrument, health condition, medical record, biometric information, sexual orientation of the Candidate.
<u>Collection of Candidate Data by Capgemini:</u>	<p>The Candidate may submit Candidate Data to Capgemini through electronic means and/or submission of documents.</p> <p>Capgemini may collect Candidate Data directly from the (i) Candidate/ job applicant or (ii) from third parties (e.g. recruiters, recruitment portals, background verification vendors).</p> <p>Candidates may volunteer personal information; for e.g. by submission of a CV containing such information.</p>
<u>Purposes and Legal Basis for Processing of Candidate Data:</u>	<p>Capgemini processes Candidate Data for recruitment-employment purposes, legitimate interests and business management/operations. These include identifying and evaluating Candidates for job positions including deployment/assignment of the Candidate on IT/ITES projects for clients; record-keeping related to hiring processes; analyzing hiring process and outcomes; & conducting background checks.</p> <p>Capgemini may also undertake data analytics for monitoring, analyzing, improving and ensuring the proper functionality of its recruitment operations.</p>

	If a Candidate is hired, Candidate Data may be used in connection with his/her employment consistent with Capgemini's internal data privacy policy and Binding Corporate Rules.
<u>Sensitive Candidate Data:</u>	To the extent the Candidate makes Sensitive Candidate Data available to Capgemini, the Candidate consents to Capgemini processing such Data in accordance with this notice. If a Candidate has a disability and would like Capgemini to consider an accommodation, the Candidate may provide that information during the recruiting process or even later.
<u>Access to Candidate Data:</u>	Within Capgemini India, access to Candidate Data will be limited, on a need-to-know basis, to employees performing specific tasks that require knowledge of some or all the Candidate Data. This may include staff involved in human resources management, IT security, legal, finance, audit, & corporate investigations.
<u>Disclosure of Candidate Data to Third Parties:</u>	<p>Capgemini may disclose Candidate Data on need-to-know basis to clients and to third-parties, such as suppliers/service providers performing certain services for Capgemini (e.g. Background Verification Vendors, Payroll agency, etc). The third-party providers have access to Candidate Data solely for the purposes of performing the services specified in the applicable service contract, and Capgemini by Agreement requires such third party/contractor to implement appropriate technical, organizational and security measures against loss or unauthorized access or use.</p> <p>In addition, Capgemini may be required to disclose certain Candidate Data to other third parties: (i) as required by law or directed by a court or regulatory authority; (ii) to protect Capgemini's legal rights to the extent authorized or permitted by law; (iii) in an emergency where the health or safety of a Candidate or other individual may be endangered.</p>
<u>Cross-border Transfer of Candidate Data:</u>	Capgemini operates globally in several countries and accordingly, Candidate Data may be transferred to any global location or data center of Capgemini, for centralized record keeping, administrative purposes, in so far as a reasonable level of data protection is assured in the recipient country. Capgemini maintains standards consistent with this Notice and its Binding Corporate Rules, to its operations globally.
<u>Security & Confidentiality of Candidate Data:</u>	Capgemini employs technical & organizational measures designed to protect the integrity, confidentiality, security and availability of Candidate Data. Capgemini limits access to internal systems/tools that hold Candidate Data to individuals on a need to know basis and to third parties that agree to protect the information in a manner consistent with the terms of this notice.
<u>Accuracy of Candidate Data and Individual Rights:</u>	<p>Capgemini aims to keep all Candidate Data as accurate, correct, up-to-date, reliable and complete as possible. However, the accuracy of any Candidate Data depends to a large extent on the Data the Candidate provides. A Candidate may request correction or deletion of Candidate Data, except where retention is required for legal purposes or in the context of a dispute.</p> <p>Candidate must (i) provide Capgemini with accurate (not misleading), updated and complete information; (ii) update Candidate Data that becomes incorrect or out of date.</p> <p>If processing of any Candidate data is based on consent, Candidates have the right to withdraw that consent by contacting Capgemini data protection officer: dpo.in@capgemini.com. However, this does not affect Capgemini's right to process Candidate Data obtained prior to withdrawal of consent, nor does it</p>

	affect Capgemini right to process Candidate Data on legal basis other than consent.
<u>Retention of Candidate Data:</u>	<p>Capgemini may retain Candidate Data for other job positions within the organization. Capgemini shall determine appropriate retention periods considering the purposes and relevant legal requirements. Once Capgemini no longer requires the Candidate Data, it is destroyed appropriately and securely or anonymized in accordance with the law.</p> <p>If the Candidate does not want to be considered for other positions or would like to have Candidate Data removed, you may contact Capgemini using the email address dpo.in@capgemini.com.</p>
<u>Grievance Officer:</u>	The Candidate may submit any grievances/requests relating to processing of his/her Candidate Data by sending a request in writing to: the Grievance Officer or Data Protection officer by email dpo.in@capgemini.com . The Grievance Officer shall redress the grievance expeditiously and in any event within the period prescribed by law. Capgemini reserves the right to decline to process any such request which may jeopardize the security and confidentiality of the Personal Data of others, as well as requests which are impractical or not made in good faith, or the circumstances as provided for under the law permit Capgemini to refuse such request(s).
<u>Direct Marketing:</u>	Capgemini will not provide Candidate Data to third parties for their direct marketing of any products or services.
<u>Changes to this Notice:</u>	Capgemini reserves the right to modify this notice by posting changes on Capgemini India website.