

# Privacy

<b>Doc Type:</b>	A
<b>Family ID:</b>	01
<b>Doc ID:</b>	0013
<b>Effective Date:</b>	9-Feb-2024
<b>Next Review Date:</b>	9-Feb-2025

**CONTENTS**

<b>Overview .....</b>	<b>3</b>
Purpose.....	3
Scope.....	3
<b>Policy Principles for Employee Personal Information .....</b>	<b>3</b>
Identifying Purposes for Employee Personal Information.....	3
Consent.....	3
Obtaining Consent .....	3
Exceptions .....	3
Limiting Collection .....	4
Limiting Use, Retention and Disclosure .....	4
Accuracy .....	4
Safeguards.....	4
Individual Access .....	5
Concerns Regarding Compliance (Challenging Compliance) .....	5
Apec Participation .....	5
<b>Policy Principles for Customer Data .....</b>	<b>5</b>
Notice .....	5
Choice and Consent .....	6
Collection Limitation .....	6
Purpose Limitation .....	6
Access and Correction .....	6
Disclosure of Information .....	6
Security .....	6
Openness.....	6
Accountability .....	7
Compliance .....	7
<b>Policy Compliance .....</b>	<b>7</b>
Enforcement.....	7
Exceptions.....	7
Non-Compliance .....	7
<b>Roles and Responsibilities .....</b>	<b>7</b>
Chief Privacy Officer .....	7
Cyber Security Council .....	7
Information Security Team.....	7
Human Resources .....	8
Employees .....	8
Subcontractors.....	8
<b>Cross Reference of Related Standards, Policies, or Processes .....</b>	<b>8</b>
<b>Appendix A. Miscellaneous.....</b>	<b>8</b>
Common Terminology.....	8
Organizational Impact Cross Map .....	8
<b>Document History .....</b>	<b>9</b>

*Note. Throughout this document [24]7.ai, Inc. will be referred to as [24]7.*

## OVERVIEW

### PURPOSE

The purpose of this Policy is to establish [24]7's principles for the management of personal information as it relates to the collection, use and disclosure of personal information for reasonable business purposes that recognizes:

- Employee's rights to privacy, and
- Customer's rights of privacy

The Privacy Policy is based on the fundamental principles as set out in section four and five. It should be understood that this policy does not in any manner diminish employee's obligations or responsibilities towards maintaining confidentiality of [24]7's or its client's information.

### SCOPE

This policy is applicable to all Personal Information collected in the process of conducting [24]7's business, including:

- Employee Personal Information:
  - [24]7 shall Collect, Use and Disclose Employee Personal Information only as permitted by or only as set out in this Privacy Policy; and
- Customer Data:
  - [24]7 shall Collect, Use, and Disclose Customer Data based on the Client's requirements as set out in its contract with [24]7.

## POLICY PRINCIPLES FOR EMPLOYEE PERSONAL INFORMATION

### IDENTIFYING PURPOSES FOR EMPLOYEE PERSONAL INFORMATION

[24]7 shall identify the purposes for which information is collected at or before the time the information is collected.

[24]7 collects employee personal information for the following purposes:

- Establish and maintain employee relationships
- Develop, enhance, or provide Employee products and services
- Manage and develop personnel and employment matters
- Meet legal and regulatory requirements

### CONSENT

#### OBTAINING CONSENT

In determining whether consent is required and, if so, what form of consent is appropriate, [24]7 will take into account both the sensitivity of the personal information and the purposes for which [24]7 will use the information.

Consent may be express, implied (including through use of "opt-out" consent where appropriate), or deemed.

[24]7 shall ensure that Consent is not obtained through deceptive means.

#### EXCEPTIONS

[24]7 may disclose employee personal information without the employee's knowledge or consent in certain circumstances where seeking consent may be impractical or unlawful. For example, emergency medical situations, law enforcement or as may otherwise be required by applicable laws.

## **LIMITING COLLECTION**

The Collection of Personal Information shall be:

- limited to that personal information that is necessary for the purposes identified in Section 4.1, Identifying Purposes
- By fair and lawful means; and
- In accordance with approved [24]7 processes and procedures.

Whenever previously Collected Employee Personal Information is to be utilized for a purpose not previously identified, except when required by law, [24]7 shall;

- Identify the new purpose
- Inform employee(s) of the new purpose
- Seek the employee's consent prior to use.

## **LIMITING USE, RETENTION AND DISCLOSURE**

Employee personal information shall not be used or disclosed for purposes other than those for which the personal information was collected, except with the consent of the employee.

[24]7 shall only retain employee personal information in accordance with the period of time specified in [24]7's Data Retention Archival and Destruction Policy and/or as required by law.

## **ACCURACY**

Employee personal information shall be as accurate, complete and up-to-date as is necessary for the purpose for which it is to be used. [24]7 shall use commercially reasonable efforts and have systems and processes in place to ensure the integrity of employee personal information.

Employees shall ensure the accuracy and completeness of employee personal information and further ensure that such information is up-to-date as necessary for the purposes for which it is to be used.

An employee may challenge the accuracy and completeness of one's employee personal information and seek amendment to the inaccurate information. [24]7 makes reasonable efforts to incorporate the changes in its records as soon as practicable (within 30 days).

## **SAFEGUARDS**

[24]7 shall ensure that employee personal information is adequately and securely protected at all times by utilizing appropriate safeguards commensurate to the sensitivity of the employee personal information that has been or is being collected, the amount, distribution, and format of the information, and the method of storage. All [24]7 employee personal information shall be classified as confidential.

Safeguards shall be implemented to protect employee personal information against loss or theft, unauthorized access, disclosure, copying, use, or modification.

The following methods of protection shall be considered:

- Physical measures including but not limited to locked filing cabinets and restricted access to offices
- Organizational measures including security clearances and limiting access on a "need-to-know" basis
- Technological measures including but not limited to the use of passwords, encryption or other available technology

[24]7 shall ensure that necessary care is used in the disposal or destruction of employee personal information to prevent unauthorized parties from gaining access to it.

## INDIVIDUAL ACCESS

Upon request, an employee shall be informed of the existence, use, and disclosure of one's employee personal information and shall be given access to such information in a timely manner.

## CONCERNS REGARDING COMPLIANCE (CHALLENGING COMPLIANCE)

If any employee is concerned about the collection, use or disclosure of their employee personal information in relation to the principles of this policy, such concerns should be forwarded to the attention of the Chief Privacy Officer at [privacy@247.ai](mailto:privacy@247.ai). The Chief Privacy Officer shall investigate and respond to all complaints. In cases where a concern or complaint is found to be justified through a complaint review process, the Chief Privacy Officer shall ensure that appropriate measures are taken to rectify the complaint including, if necessary, amending the policies and practices.

## APEC PARTICIPATION

[24]7's privacy practices, described in this Privacy Policy, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies.

## POLICY PRINCIPLES FOR CUSTOMER DATA

[24]7 with its clients shall identify the purposes for which the privacy information is collected at or before the time the privacy information is collected.

[24]7 collects customer's privacy information for the purposes defined by its clients for the purpose of illustration, the customer data may be collected for the following purposes:

- Understand customer needs and preferences to provide timely, reliable and value-added services including account management, information management, technical support, e-commerce and related activities
- Establish and maintain customer relationships
- Develop and enhance marketing and/or provide marketing services
- Meet legal and regulatory requirements

## NOTICE

[24]7 shall give simple-to-understand notice of its information practices to all individuals, in clear and concise language, before any personal information is collected from them.

Such notices include:

- During Collection
  - What personal information is being collected
  - Purposes for which personal information is being collected
  - Uses of collected personal information
  - Whether or not personal information may be disclosed to third persons
  - Security safeguards established by [24]7 in relation to the personal information
  - Processes available to data subjects to access and correct their own personal information
  - Contact details of the privacy office
- Other Notices
  - Data breaches must be notified to affected individuals and the commissioner when applicable
  - Individuals must be notified of any legal access to their personal information after the purposes of the access have been met
  - Individuals must be notified of changes in [24]7's privacy policy
  - Any other information deemed necessary by the appropriate authority in the interest of the privacy of data subjects

## **CHOICE AND CONSENT**

[24]7 shall agree in written contracts with its clients that they have sufficient rights, including their end users' consent, to allow us to collect both personal information and interaction data. Clients shall give individuals choices (opt-in/opt-out) with regard to providing their personal information, and take individual consent only after providing notice of its information practices. Only after consent has been taken will [24]7 collect, process, use, or disclose such information to third parties, except in the case of authorized agencies. The data subject shall, at any time while availing the services or otherwise, also have an option to withdraw one's consent given earlier to the client. In such cases [24]7 shall have the option not to provide goods or services for which the said information was sought if such information is necessary for providing the goods or services. In exceptional cases, where it is not possible to provide the service with choice and consent, then choice and consent should not be required.

## **COLLECTION LIMITATION**

[24]7 shall only collect personal information from data subjects as is necessary for the purposes identified in the contracts with its clients for such collection, regarding which notice has been provided and consent of the individual taken. Such collection shall be through lawful and fair means.

## **PURPOSE LIMITATION**

Personal data collected and processed by [24]7 shall be adequate and relevant to the purposes for which they are collected and processed. [24]7 shall collect, process, disclose, make available, or otherwise use personal information only for the purposes as stated in the contracts with the clients after taking consent of individuals. If there is a change of purpose, the onus of notifying this to the individuals rests with the clients. After personal information has been used in accordance with the identified purpose it should be destroyed as per the identified procedures. Data retention mandates by the government should be in compliance with the applicable National Privacy Principles.

## **ACCESS AND CORRECTION**

Individuals shall have access to personal information about them held by [24]7; shall be able to seek correction, amendments, or deletion of such information where it is inaccurate; be able to confirm that [24]7 holds or is processing information about them; be able to obtain from [24]7 a copy of the personal data. Access and correction to personal information may not be given by [24]7 if it is not, despite best efforts, possible to do so without affecting the privacy rights of another person, unless that person has explicitly consented to disclosure. All such access and correction requests from the individual should be routed through their respective client(s). [24]7 will make reasonable efforts to incorporate such changes, or respond to requests for access, deletion, correction, amendment, and/or restriction in [24]7's records within 30 days.

## **DISCLOSURE OF INFORMATION**

[24]7 shall not disclose personal information to third parties, except after providing notice and seeking informed consent from the individual for such disclosure. Third parties are bound to adhere to relevant and applicable privacy principles. Disclosure for law enforcement purposes must be in accordance with the laws in force. [24]7 shall not publish or in any other way make public personal information, including personal sensitive information.

## **SECURITY**

[24]7 shall secure personal information that they have either collected or have in their custody, by reasonable security safeguards against loss, unauthorized access, destruction, use, processing, storage, modification, de-anonymization, unauthorized disclosure [either accidental or incidental] or other reasonably foreseeable risks.

## **OPENNESS**

[24]7 shall take all necessary steps to implement practices, procedures, policies and systems in a manner proportional to the scale, scope, and sensitivity of the data they collect. In order to ensure compliance with privacy principles, information regarding those principles shall be made in an intelligible form, using clear and plain language, and made available to all individuals.

## **ACCOUNTABILITY**

[24]7 shall be accountable for complying with measures which give effect to the applicable privacy principles. Such measures include mechanisms to implement privacy policies; including tools, training, and education; external and internal audits, and requiring organizations or overseeing bodies extend all necessary support to the privacy office and comply with the specific and general orders of the applicable privacy office.

## **COMPLIANCE**

[24]7 has implemented internal controls and procedures designed to ensure compliance with applicable laws, regulations and legislations in the jurisdiction in which it operates.

[24]7 recognizes the importance of industry self-regulation and believes such actions are the best way to protect the privacy of an individual. [24]7 also respects legislation and regulatory efforts to introduce fair and workable guidelines that protect the privacy of consumers and also allow consumers to continue receiving the benefits that sophisticated marketing techniques and services provide.

## **POLICY COMPLIANCE**

### **ENFORCEMENT**

The Chief Privacy Officer shall ensure that [24]7's privacy practices are monitored and reviewed at least annually.

### **EXCEPTIONS**

Exceptions to this policy must follow the Exception procedure and have obtained proper approvals.

### **NON-COMPLIANCE**

Any Employee that is found to have breached this policy shall be subject to disciplinary actions up to and including termination.

## **ROLES AND RESPONSIBILITIES**

### **CHIEF PRIVACY OFFICER**

[24]7 is responsible and accountable for all personal information under its control including information that has been transferred to third party companies for processing (i.e. customer data or employee benefit information). The Chief Information Security Officer at [24]7 who reports to General Counsel is the designated Chief Privacy Officer who shall have responsibility and accountability for [24]7's compliance with the applicable privacy legislations.

The Chief Privacy Officer shall recommend appropriate procedures and controls to protect personal information, establish procedures to receive and respond to privacy related complaints and inquiries, develop and provide training, and ensure that [24]7 privacy related policies, procedures and practices are communicated to all employees and clients.

### **CYBER SECURITY COUNCIL**

[24]7's cross-functional Cyber Security Council is comprised of the Chief Privacy Officer and designates from, including but not limited to, Human Resources, Legal, Finance, Information Technology, Information Security and Operations Departments (collectively the "Cyber Security Council"). This council shall convene on a regular basis and shall review and provide management oversight on recommendations provided by the Chief Privacy Officer.

### **INFORMATION SECURITY TEAM**

The Information Security (InfoSec) team will be responsible for reviewing and updating the Privacy Policy based on the directions from the Chief Privacy Officer.

## HUMAN RESOURCES

The Human Resources (HR) department is the custodian of employee data. This department is responsible for maintaining and protecting the personal information under its control and will maintain employee files and records in a manner that ensures security of such data and shall limit access to such information only to authorized individuals.

## EMPLOYEES

All Employees must complete an awareness training session pertaining to this policy and abide by this policy and any changes that may occur from time to time.

Employees shall seek the necessary support from their managers and/or the Chief Privacy Officer whenever required in order to comply with this policy. Employees shall direct and report all privacy related concerns to the attention of the Chief Privacy Officer at [privacy@247.ai](mailto:privacy@247.ai)

## SUBCONTRACTORS

[24]7 shall use commercially reasonable efforts to ensure subcontractors with access to personal information abide by this policy.

## CROSS REFERENCE OF RELATED STANDARDS, POLICIES, OR PROCESSES

- A01.0014.Data Classification
- A01.0001.Data Records Retention Schedule
- A01.0003.Data Protection and Privacy

## APPENDIX A. MISCELLANEOUS

## COMMON TERMINOLOGY

Term	Definition
APEC	Asia-Pacific Economic Cooperation
CBPR	Cross Border Privacy Rules

## ORGANIZATIONAL IMPACT CROSS MAP

Below is the organizational impact cross map. Choose all that apply and/or add a description to any "Other" selections.

- ☒ Global
- ☐ Corp
- ☐ BPO
- ☐ Remote/WFH
- ☐ Other :: Enter Description.



## DOCUMENT HISTORY

Note. All prior document history beyond 6 years is stored offline in a locked spreadsheet. For any review, refer to Global InfoSec GRC Team.

Version	Author & Title	Purpose/Change	Date of Change	Approver & Title	Approved Effective Date
1.0	Pushpa Iyengar	Address Change	9-Jun-06	Satya Gopal Kalluri	9-Jun-06
2.0	Rakesh Babuji	Annual review performed	19-Jul-07		19-Jul-07
2.1	Rakesh Babuji	Annual review performed	20-Jul-08		20-Jul-08
2.2	Rakesh Babuji	Annual review performed	20-Jul-09		20-Jul-09
2.3	Rakesh Babuji	Annual review performed	20-Jul-10		20-Jul-10
2.4	Rakesh Babuji	Annual review performed	10-Jun-11		10-Jun-11
3.0	Vinay Kumar	Annual review performed, changed logo	14-Feb-12	Satya Gopal Kalluri	14-Feb-12
3.1	Vinay Kumar	Annual review performed	4-Feb-13		4-Feb-13
3.2	Vinay Kumar	Annual review performed	22-Feb-14		22-Feb-14
4.0	Poorvi Kulkarni	Annual review performed, changed policy template, company's name from 24/7 Customer to [24]7.ai	16-Jan-15	Jason Hoffman	16-Jan-15
5.0	InfoSec	Annual review performed, removed Date Column and updated Reviewed Date column with the same date. Authored name changed to InfoSec. Approved by is changed to CISO. Policy No is changed to Policy name and is updated per [24]7 Policy Organization Structure.	27-Jan-16	Satya NM	27-Jan-16
5.1	Tanzeem Khan	Updated the last review details. Added the Revision number column.	9-May-16	Satya NM	9-May-16
5.2	Chandrashekar	Revised the privacy policy to include Employee Privacy Data.	14-Dec-16	Chief Privacy Officer	14-Dec-16
6.0	Chandrashekar	Annual review performed, updated company name and moved policy to new template	5-Dec-17	Chief Privacy Officer	5-Dec-17
6.1	Chandrashekar	Annual review performed	3-Dec-18	Chief Privacy Officer	3-Dec-18
7.0	Chandrashekar	Updated APEC CBPR participation details	19-Dec-18	Chief Privacy Officer	19-Dec-18
8.0	Chandrashekar	Annual review performed, updated sections 2.5.3 and 5.5 with applicable time frames	22-Apr-19	Chief Privacy Officer	22-Apr-19
8.1	JoAnna Velez, Director Security PMO & Process Improvement	Annual review performed	4-Nov-20	Rebecca Wynn, Global CISO & CPO	4-Nov-20
8.2	Khristine Fondren, Senior Process Analyst	Annual review performed	4-Nov-21	JoAnna Velez, Director Security PMO & Process Improvement	4-Nov-21
9.0	Syed Yousuf - Security Specialist – Global InfoSec	Annual review performed, updated to new template	15-Feb-22	Mehrdad Kalantarian - Director InfoSec GRC/DPO	15-Feb-22
9.1	Sirisha Sikile, Security and Compliance Analyst - 1	Annual review performed	8-Feb-23	Mehrdad Kalantarian - Director InfoSec GRC	10-Feb-23
9.2	Sirisha Sikile, Security and Compliance Analyst - 1	Annual review performed	8-Feb-24	Mehrdad Kalantarian - Director InfoSec GRC	9-Feb-24