

PRIVACY NOTICE

EMPLOYMENT WITH CONCENTRIX

When you apply and accept employment with Concentrix and its affiliates (collectively, "Company"), you also consent to the collection and processing of your personal information by the Company.

Personal information, in general, refers to any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual. On the other hand, sensitive personal information refers to personal information:

- (a) About an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
- (b) About an individual's health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such person, the disposal of such proceedings, or the sentence of any court in such proceedings;
- (c) Issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
- (d) Specifically established by an executive order or an act of Congress to be kept classified.

This Notice, in consonance with the requirements of Republic Act No. 10173, otherwise known as the "Data Privacy Act" ("DPA") and its applicable rules and regulations, serves to inform you of the details of the processing being done by the Company in relation to and because of your employment with the Company.

I. Collection and Use of Personal Information

A. Types of Personal Information to be Processed

In the course of your employment with the Company, your following personal information are collected and processed by the Company:

A. Non-Sensitive

- 1. Full Name (Last, First and Middle)
- 2. Address
- 3. Contact Details
- 4. Emergency Contact Person and Contact Details
- 5. Employee Identification Number
- 6. Employment Background

B. Sensitive Personal Information

- 1. Marital Status
- 2. Citizenship
- 3. Educational Background
- 4. Health Information
- 5. Information on any proceedings for any offense you committed, if any
- 6. Government-issued Numbers and Records
- 7. Tax Returns
- 8. Date of Birth

The Company may additionally request, or come upon or receive, during the course of your employment, other personal information not enumerated above.

B. Scope and Method of Collection

The personal information are collected, through, but not limited to, application forms, government forms and documents you fill-up, the updates in your Workday profile, CCTVs maintained by the Company, reports on background checks, and other means of collecting personal information.

C. Purpose and Use of Personal Information

The personal information collected will be accessed, stored, and processed for the purpose of employment application, employee identification, employee verification, background checking, personnel and workplace management, employee compensation and benefits management, work assignment, employee referrals, employee-related reports, establishment and defense of legitimate interests of the Company and its representatives or clients, and other legitimate processing necessary for the Company to do its business as well as in providing services to its clients. Pursuant to said purposes and other legitimate interests and purposes not mentioned above, the Company may disclose to third parties your personal information, including, but not limited to, the Company affiliates (including its affiliates in countries that have different data protection regimes), clients, government authorities, auditors, and other third parties.

Your personal information will be retained by the Company only for as long as necessary for the fulfillment of the above purposes.

II. Your Rights as a Data Subject

You will continue to have the rights of a data subject under the law, including the right to be informed, object, withdraw consent, access, rectify, erasure, blocking, file a complaint, to be indemnified, and data portability. Your lawful heirs upon your death or when you became incapable of exercising your rights may exercise your rights as a data subject.

Note that there are legitimating processing of your personal information, under an employee-employee relationship and other exemptions under the DPA, which does not require your consent as a data subject. Note further that your withholding or withdrawal of your consent, objecting to the processing or sharing of your personal information may result to interruption of some of your benefits as an employee or inability of the Company to continue your employment.

III. Contact Us

If you have any questions, concerns, objections about this Notice, and personal information processing to be conducted in relation to your employment, you may contact the Company through the following Data Protection Officer and Compliance Officers for Privacy:

Company	Concentrix
Tel. No.	7923000 (trunkline)
Fax. No.	--
E-mail	dataprivacy.ph@concentrix.com
Office Address	Ayala North Exchange Tower 2 6798 Ayala Ave. cor. Amorsolo and Salcedo Streets, Makati City

CRITICAL INCIDENT REPORT PROJECT

Concentrix is a member of the Call Center Association of the Philippines ("CCAP"), an organization of companies engaged in business process outsourcing ("BPO") services in the Philippines. In support of CCAP's endeavor to maintain honesty, integrity, professionalism, and fairness within the BPO industry, the Company will participate in the implementation of CCAP's Critical Incident Report ("CIR") Project, a centralized database containing specific personal information of current and former employees of all CCAP-member companies. The purpose of this project is to provide member companies with a means of obtaining CIRs on prospective job applicants who are either in transition from, or former employee of, a CCAP member as well as Industrywide Fraud Report Analytics. Hence, CCAP employers will be able to perform streamlined background checks on job applicants while helping CCAP, as a whole, prevent future fraud-related incidents from affecting the BPO industry.

Inasmuch as the CIR Project will involve the processing of your personal information, this Notice serves to inform you of:

- (a) The description of your personal information to be processed in relation to the CIR Project;
- (b) The scope, source and method of the personal information processing involved in the CIR Project;
- (c) The purpose of such processing and the legitimate interests of the parties involved in such processing;
- (d) The identities of the intended recipients of your personal information;
- (e) How long your personal information in relation to the CIR Project will be retained; and
- (f) Your rights as Data Subjects who own and control the personal information being processed.

II. Collection and Use of Personal Information

A. Types of Personal Information to be Processed

The CIR Project involves the establishment of a centralized database covering the following personal information:

A. Non-Sensitive

- 1. Employee's Full Name (Last, First and Middle)
- 2. Employee's Date of Hire
- 3. Employer's Identity
- 4. The reason for the employee's separation or departure from service.

B. Sensitive Personal Information

- 1. A factual statement that internal proceedings conducted pursuant to an investigation of a disciplinary action for fraud and similar acts against such an employee as defined under the Rules of Listing attached as Annex "A" of this Notice and Consent Form, the results thereof, up to the termination from service of said employee, and whether or not the result of the investigation is the cause or reason of such termination.
- 2. A factual statement that civil or criminal action(s) were filed pursuant to the investigation conducted by the employer whether the same remains pending even after termination or departure from service.
- 3. Employee's Date of Birth

B. Scope and Method of Collection and Data Sharing

The Company already collects the personal information outlined above pursuant to a) the terms and conditions of the Data Subject's employment contract with the company; b) the company's ordinary day-to-day human resource management activities; and c) the normal course of conducting administrative investigations on its employees where applicable.

The CIR Project is a joint undertaking of CCAP and CIBI Information, Inc. ("CIBI"), an information company engaged by CCAP to provide portal and database hosting services for the storage and retention of the personal information to be utilized by the CIR Project. To operationalize the CIR Project, the Company will share the personal information above to CIBI by uploading the same through the latter's online portal. The uploading of information will only be allowed upon existence of the following conditions:

- a) The fraud committed by the employee;
- b) The Consent Form duly executed by the employee; and
- c) The final disposition of the fraud investigation served to the employee.

CCAP-member companies who wish to verify whether a prospective employee is included in the CIR can send verification requests directly to CIBI, who, in turn will share the CIR containing the above information to the requesting company. Based on the CIR database, CIBI will also provide CCAP with consolidated Fraud Industry Report Analytics for future fraud prevention activities and policies. CCAP member companies will not be given broad access to the CIR database but only to the personal information pertaining specifically to the prospective employee being evaluated and upon formal request. More importantly, only CCAP-members will be allowed to send CIR requests to CIBI.

III. Your Rights as a Data Subject

1. **The Right to be Informed** - This Notice and Consent Forms honors your right to be informed of whether personal information pertaining to you will be, are being, or were processed, including its disclosure to third parties. As you will see above, we endeavored: i) to provide you with a description of the personal information we collect, will collect and share pursuant to the CIR Project and the purpose/s thereof; ii) to obtain your consent; iii) to explain the scope and method of the collection and sharing; and iv) the recipients of the personal information collected and shared;
2. **The Right to Object** - You have the right to object to the sharing of your information in relation to the CIR Project. Should there be any changes in the information provided to you in the Notice and Consent Form, you should be informed of such changes and your consent thereto obtained before such changes are implemented.
3. **The Right to Withdraw Consent Anytime** - You have the right to withdraw your consent to the sharing of your information pursuant to the CIR Project.
4. **The Right to Access, Erasure and/or Blocking** - You have the right to request for a copy of any personal data we hold and shared about you, including the sources from which such information was collected and to whom the same is shared. You have the right to have it corrected or revised if you think it is inaccurate or incomplete. You have the right to suspend, withdraw or order the blocking, removal or destruction of your personal information from the CIR Project should you a) discover that it is incomplete, outdated, false, unlawfully obtained, used for an unauthorized purpose, no longer necessary for the purposes of the CIR Project; b) withdraw your consent thereto; or c) discover violations of your right as a data subject.
5. **The Right to Damages** - You have the right to be indemnified for any damages sustained due to any violations of your rights as a data subject.
6. **The Right to Complain** – If you are the subject of a privacy violation or personal data breach, you may file complaints with the National Privacy Commission.
7. **The Right to Data Portability**- You have the right to obtain a copy of your personal information in an electronic or structured format.

IV. Personal Data Retention and Disposal

Your personal information will only be kept in CIR database only for as long as is necessary for the fulfillment of the declared, specified and legitimate purposes provided above, or when the processing is relevant to the purpose. After which, personal data shall be disposed or discarded in a secure manner that would prevent further processing, unauthorized access or disclosure to any other party or the public, or prejudice the interests of the data subjects.

V. Contact Us

If you have any questions, concerns, objections about this Notice, and personal information processing to be conducted in relation to the CIR Project please contact us through the following:

Company	Concentrix
Tel. No.	7923000 (trunkline)
Fax. No.	--
E-mail	dataprivacy.ph@concentrix.com
Office Address	Ayala North Exchange Tower 2 6798 Ayala Ave. cor. Amorsolo and Salcedo Streets, Makati City

Company	Call Center Association of the Philippines
Tel. No.	843-0603; 843-0058
Fax. No.	--
E-mail	inquiry@ccap.ph
Office Address	Shops 3-5, Ayala Tower, The Peninsula Manila, Ayala Ave. cor Makati Ave., Makati City

Company	CIBI Information, Inc.
Tel. No.	819-2424
Fax. No.	896-2880
E-mail	alquinto@cibi.com.ph
Office Address	30/F BDO Equitable Tower, 8751 Paseo de Roxas, Makati