

# Capgemini Group Data Privacy Policy

As one of the world's foremost providers of consulting, technology and outsourcing services to a wide array of clients around the world and providing services in more than 40 countries, Capgemini is committed to protecting privacy and the Personal Data entrusted to it, whether acting as a Data Controller or as a Data Processor (see Definitions at the end of document).

Most of the countries where Capgemini provides services have data protection or privacy laws designed to regulate and safeguard the collection, use, transfer, storage and disposal of Personal Data. As stated in its Code of Business Ethics, Capgemini is committed to complying with the data protection and privacy laws of the countries where Personal Data is collected and processed.

In order to give full effectiveness to its commitments, Capgemini is implementing a comprehensive privacy compliance program in addition to this Capgemini Data Privacy Policy, which is comprised of the following elements:

- A global Cybersecurity and Information Protection organization which includes:
  - Data Protection Officers
  - Privacy lawyers
  - Cybersecurity professionals
- Privacy awareness and training:
  - Privacy and security awareness training for Employees
  - Confidentiality reminders for Employees
  - Account-specific privacy and security training
  - Work group or industry-specific privacy and security training
  - Periodic privacy and security awareness interventions
- Monitoring of compliance with regulatory and contractual privacy requirements:
  - Internal audits
  - Client audits
  - Compliance to framework standards' best practices (such as ISO)
  - Data Protection Officers quality reviews
- A Global Security Incident Response Process and client-specific incident response plans
- Binding Corporate Rules for Data Controller and Data Processor roles.

This Capgemini Data Privacy Policy encapsulates the principles governing the processing of Personal Data across the entire Group. Compliance with this Policy is mandatory for all Capgemini Companies, Capgemini Business Units and Employees collecting and/or processing Personal Data.

This Capgemini Data Privacy Policy applies to all processing activities of Capgemini, whether acting as a Data Controller or as a Data Processor.



### **1.1 Capgemini processes Personal Data in a fair, lawful and transparent manner**

Capgemini processes Personal Data in compliance with Applicable Law and the Data Controller's instructions (when applicable).

When acting as Data Controller, subject to Applicable Law, Capgemini shall provide all relevant information to the Data Subject in compliance with fair processing and transparency principles.

When acting as a Data Processor, Capgemini shall assist the Data Controller in doing the same.

This includes respecting the Data Subject's rights by updating, correcting or deleting the Personal Data accordingly so that it is accurate and where necessary kept up-to-date in accordance with Capgemini's applicable procedure.

### **1.2 Capgemini processes Personal Data for limited and defined purposes**

Capgemini only processes Personal Data in compliance with the purpose for which it is originally collected and in compliance with the Data Controller's instructions (when applicable).

Subject to Applicable Law, Capgemini shall not process Personal Data for other purposes, except with the consent of the Data Subject or the Data Controller.

Personal Data is only disclosed for legitimate and relevant "need-to-know" purposes for business or legal reasons. In each instance, any disclosure of Personal Data is strictly limited to what is necessary and reasonable to comply with the purpose of the processing.

Capgemini is committed to use processes and tools that integrate privacy from their inception (privacy-by-design).

### **1.3 Capgemini processes Personal Data for a limited duration**

In accordance with Applicable Law, Capgemini's internal rules and the Data Controller's instructions (when applicable), Capgemini only processes Personal Data for as long as it is necessary for the purpose(s) for which it is processed.

At the end of the processing, Capgemini shall archive, anonymize or destroy the Personal Data, and otherwise follow the Data Controller's instructions (when applicable).

### **1.4 Capgemini processes Personal Data securely**

As a general rule and unless otherwise required by the client, Capgemini applies the same standard level of security to Personal Data it processes as a Data Controller and Personal Data it processes as a Data Processor.

Capgemini applies and maintains appropriate technical, physical, and organizational measures to protect Personal Data against unauthorized access and to avoid its accidental loss, damage, destruction or other unlawful form of processing.



These measures follow industry practices and standards and are aimed at establishing a level of security appropriate to the risks represented by the processing and the nature of the Personal Data to be protected.

Capgemini shall report any serious Data Breach to the authorities and/or the Data Subject and/or the Data Controller as per Applicable Law or contractual provisions if it becomes aware that the security, confidentiality or integrity of the Personal Data has been compromised.

### **1.5 Capgemini works with Data Processors in a responsible manner**

Subject to Applicable Law, when using Internal or External Data Processor, Capgemini shall enter into appropriate agreements that require that Personal Data is stored and processed in accordance with Applicable Law, including applying appropriate security measures.

When Capgemini acts as a Data Processor, the same shall apply in addition to the Data Controller's instructions.



## Definitions of the Data Privacy Policy

**“Applicable Law”** means any data privacy or data protection law, applicable at the time of the processing.

**“Capgemini Business Unit”** means a Capgemini business organization. A Capgemini Business Unit can be part of a Capgemini Company or span several Capgemini Companies located in different countries, inside and/or outside of the EEA.

**“Capgemini”** or **“Group”** means the entire Group of Capgemini Companies controlled, directly or indirectly, by Cap Gemini SA.

**“Capgemini Company(ies)”** means any company within Capgemini which is controlled directly or indirectly by Cap Gemini SA.

**“Data Breach(es)”** means any compromise of security that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to protected data transmitted, stored or otherwise processed.

**“Data Controller”** means the company that determines the purposes and means of processing the Personal Data.

**“Data Processor”** means the company which processes Personal Data on behalf of the Data Controller (whether a Capgemini Processor, i.e. an **“Internal Data Processor”**, or a non Capgemini Processor, i.e. an **“External Data Processor”**) that may be located within the EEA or outside the EEA.

**“Data Subject”** means the individual to whom the Personal Data relates.

**“Employee”** means a Capgemini Company’s Employee as well as agency workers.

**“Personal Data”** means any information relating to an identified or identifiable natural person (**“Data Subject”**). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity. Personal Data shall also be understood as Personally Identifiable Information.

**“Processing”** includes the collection, recording, organization, storage, adaptation, retrieval, consultation, use, and disclosure by transmission, dissemination or otherwise and making available, alignment or combination, blocking, erasure or destruction of Personal Data.

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