

**NTT DATA EMEA Ltd**

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2 Royal Exchange  
London EC3V3DG  
Tel: +44 (0)20 7220 9200  
Fax: +44 (0)20 7283 8944  
www.nttdata.com/emea

**Privacy Notice**

NTT DATA EMEA Ltd. (“We” or “US”) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how We collect and use personal information about You during and after your working relationship with US, in accordance with the UK General Data Protection Regulation (UK GDPR).

It applies to all employees, workers and contractors.

We are “controller” or “joint controllers” with any other NTT DATA EMEA Group Companies listed in Exhibit A, as the case maybe.

This means that We are responsible for deciding entirely or partially jointly with other NTT DATA EMEA Group Companies how and for what purposes We hold and use personal information about You.

Where We are autonomous controller of Your personal information, We are required under data protection legislation to notify You of the information contained in this privacy notice;

Where We are joint controller, We mandate our relevant NTT DATA EMEA Group Company/ies established in your country of residence or in absence established in each country referred to in Exhibit 1 to provide you with this Privacy Notice and if this is the case to be the primary point of contact for You in relation to Our processing of Your personal information under this Privacy Notice.

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if We do so, We will provide You with an updated copy of this notice as soon as reasonably practical.

It is important that You read and retain this notice, together with any other privacy notice We/our NTT DATA Group Company/ies may provide on specific occasions when We are collecting or processing personal information about You, so that You are aware of how and why We are using such information and what Your rights are under the data protection legislation.

**Data protection principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

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3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

**The kind of information we hold about you**

We will collect, store, and use the following categories of personal information about You:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependents.
- Salary, annual leave, pension and benefits information.
- Start date.
- Leaving date and your reason for leaving.
- Location of employment or workplace.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships).
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- Information about your use of our information and communications systems.
- Photographs.

We may also collect, store and use the following more sensitive types of personal information:

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- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records

**How is your personal information collected?**

We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider or via NTT DATA Group Company/ies with whom You may be offered a contract of employment for You working for Us.

We will collect additional personal information in the course of job-related activities throughout the period of You working for Us.

**How we will use information about you**

We need all the categories of information in the list above primarily to enable Us to comply with legal obligation or contractual relationship with You [\*\*] and to pursue legitimate interests [\*\*\*].

The situations in which we will process Your personal information are listed below. [We have indicated by [asterisks] the purpose or purposes for which we are processing or will process your personal information, as well as providing a description of which categories of data are involved. Where a legitimate interest is involved, We state what the legitimate interest is.

- Making a decision about your recruitment or appointment. [\*\*\*]
- Determining the terms on which you work for us, including benefits. [\*\*]
- Conducting performance reviews, managing performance and determining performance requirements. [\*\*]
- Making decisions about salary reviews and compensation. [\*\*]
- Assessing qualifications for a particular job or task, including decisions about promotions. [\*\*]
- Gathering evidence for possible grievance or disciplinary hearings. [\*\*\*]
- Making decisions about your continued employment or engagement. [\*\*\*]
- Making arrangements for the termination of our working relationship. [\*\*\*]
- Education, training and development requirements. [\*\*]

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- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work. [\*\*\*]
- Managing sickness absence. [\*\*]
- Complying with health and safety obligations. [\*\*]
- To check your use of our information and communication systems to ensure compliance with our IT policies. [\*\*\*]
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution. [\*\*\*]
- To conduct data analytics studies to review and better understand employee retention and attrition rates. [\*\*\*]
- Equal opportunities monitoring. [\*\*\*]

Some of the above grounds for processing will overlap and there may be several grounds which justify Our use of Your personal information.

**If you fail to provide personal information**

If You fail to provide certain information when requested, We may not be able to perform the contract We have entered into with You (such as paying you or providing a benefit), or We may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

**Change of purpose**

We will only use Your personal information for the purposes for which We collected it, unless We reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If We need to use Your personal information for an unrelated purpose, We will notify You and We will explain the legal basis which allows Us to do so.

Please note that we may process Your personal information without Your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**How we use particularly sensitive personal information**

In general, We will not process particularly sensitive personal information about You unless it is necessary for performing or exercising obligations or rights in connection with employment. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which We will process Your particularly sensitive personal information

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are listed below. We have indicated the purpose or purposes for which we are processing or will process your more sensitive personal information.

- We will use information about Your physical or mental health, or disability status, to ensure Your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions and permanent health insurance. We need to process this information to exercise rights and perform obligations in connection with your employment.
- If We reasonably believe that You or another person are at risk of harm and the processing is necessary to protect you or them from physical, mental or emotional harm or to protect physical, mental or emotional well-being.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, only for the purpose of managing potential claims by You with regard to alleged discrimination in the employment relationship.

**Do we need your consent?**

We do not need your consent if We use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, We may approach You for your written consent to allow Us to process certain particularly sensitive data. If We do so, We will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether You wish to consent. You should be aware that it is not a condition of your contract with US that You agree to any request for consent from us.

We do not need your consent where the purpose of the processing is to protect You or another person from harm or to protect your well-being and if we reasonably believe that You need care and support, are at risk of harm and are unable to protect yourself.

**Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

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## **Data sharing**

We might share your personal information with third parties where required by law, where it is necessary to administer the working relationship with You or where We have another legitimate interest in doing so.

### **Which third-party service providers process my personal information?**

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. Please contact [privacy.office\\_emea@nttdata.com](mailto:privacy.office_emea@nttdata.com) to ask for a list of the third parties involved.

### **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **When might you share my personal information with other entities in the group?**

We will share your personal information with other entities in our group [as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data but we also ensure to implement adequate technical and organizational measures to minimize the share of the personal data.

### **Transferring information outside EEA**

We will transfer the personal information We collect about you outside EEA in order to perform our contract with you. There are adequacy regulations in respect of Canada (commercial organisations), Japan and Switzerland. This means that those countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measure[s] to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects laws on data protection: those are SCC or BINDING CORPORATE RULES as the case may be.

## **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors

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and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from EMEA CISO at CISO-EMEA@nttdata.com.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **Data retention**

### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. [Details of retention periods for different aspects of your personal information are available in our retention policy which is available from DPO by email at [privacy.office\\_emea@nttdata.com](mailto:privacy.office_emea@nttdata.com).

Once You are no longer an employee, worker or contractor of the company We will retain and securely destroy your personal information in accordance with our data retention policy **OR** applicable laws and regulations.

## **Rights of access, correction, erasure, and restriction**

### **Your duty to inform us of changes**

It is important that the personal information We hold about you is accurate and current. Please keep Us informed if your personal information changes during your working relationship with Us.

### **Your rights in connection with personal information**

Under certain circumstances, by law You have the right, without being charged of fees, to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables You to receive a copy of the personal information We hold about you and to check that We are lawfully processing it.
- **Request correction** of the personal information that We hold about You. This enables You to have any incomplete or inaccurate information We hold about you corrected.
- **Request erasure** of your personal information. This enables You to ask Us to delete or remove personal information where there is no good reason for Us continuing to process it. You also have the right to ask Us to delete or remove your personal information where You have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where We are relying on a legitimate interest (or those of a third party) and there is something about your particular situation

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which makes You want to object to processing on this ground. You also have the right to object where We are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables You to ask Us to suspend the processing of personal information about You, for example if You want Us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [privacy.office\\_emea@nttdata.com](mailto:privacy.office_emea@nttdata.com) in writing.

**What we may need from you**

We may need to request specific information from you to help Us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

**Right to withdraw consent**

In the limited circumstances where You may have provided Your consent to the collection, processing and transfer of Your personal information for a specific purpose, You have the right to withdraw Your consent for that specific processing at any time. To withdraw Your consent, please contact [privacy.office\\_emea@nttdata.com](mailto:privacy.office_emea@nttdata.com). Once We have received notification that You have withdrawn your consent, We will no longer process your information for the purpose or purposes You originally agreed to, unless we have another legitimate basis for doing so in law.

**Data protection officer**

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If You have any questions about this privacy notice or how We handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) with respect to data protection issues or to the EEA Supervisory Authority where the relevant NTT DATA Group Companies is established as shown in Exhibit A or in the country of your residence.

**Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

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**If you have any questions about this privacy notice, please contact Giovanni Cerutti as EMEA DPO at [privacy.office\\_emea@nttdata.com](mailto:privacy.office_emea@nttdata.com) or the local DPOs of the NTT DATA Group Companies where You have Your residence listed in Exhibit A.**

I, \_\_\_\_\_ (employee/worker/contractor name), acknowledge that on \_\_\_\_\_ (date), I received a copy of [NTT DATA EMEA's privacy notice for employees, workers and contractors and that I have read and understood it.

Signature

.....

Name

.....

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EXHIBIT A

<b>COUNTRY</b>	<b>COMPANY NAME</b>	<b>ADDRESS</b>	<b>CONTACT POINT FOR DATA PROTECTION INQUIRIES</b>
<b>United Kingdom</b>	<b>NTT DATA EMEA, Ltd.</b>	2 Royal Exchange London EC3V 3DG	EMEA DPO Giovanni.cerutti@nttdata.com
<b>Italy</b>	<b>NTT Data Italia S.p.A.</b>	Viale Cassala 14/a 20143 Milano	Italian DPO Rosy.cinefra@nttdata.com
<b>United Kingdom of Great Britain and Northern Ireland</b>	<b>NTT DATA UK Ltd.</b>	3rd Floor, 2 Royal Exchange, London, EC3V 3DG United Kingdom.	UK DPO Lynda.osborne@nttdata.com
<b>Germany</b>	<b>NTT DATA Deutschland GmbH</b>	Hans-Döllgast-Strasse 26, 80807 Munich, Germany	German DPO dataprotection-germany@nttdata.com
<b>Germany</b>	<b>gen-ius dms GmbH</b>	Herforder Str. 74, 33602 Bielefeld, Germany	michael.dietrich@gen-ius.de
<b>Romania</b>	<b>NTT DATA Romania S.A.</b>	19-21 Constanta St., 400158 Cluj-Napoca, Romania	Romanian DPO nimrod.mike@nttdata.ro
<b>Austria</b>	<b>branch of NTT DATA Deutschland GmbH</b>	Millennium Tower, Rivergate – Gate 1, Handelskai 92, 1200 Wien, Austria	German DPO dataprotection-germany@nttdata.com
<b>Switzerland</b>	<b>branch of NTT DATA Deutschland GmbH</b>	Galgenfeldweg 16, CH-3006, Bern, Switzerland	German DPO dataprotection-germany@nttdata.com

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	<b>d GmbH</b>		
<b>Croatia</b>	<b>NTT DATA Croatia d.o.o.</b>	Hektorovićeva ulica 2 HR-10000 Zagreb Croatia	German DPO dataprotection-germany@nttdata.com
<b>Serbia</b>	<b>NTT DATA Romania S.A. Serbia Branch Office</b>	Str. Grckoskolska Nr. 2,21000 Novi Sad.	Romanian DPO nimrod.mike@nttdata.ro
<b>Vietnam</b>	<b>IFI Solution Co. Ltd.</b>	12th and 12A Floor, Thang Long Building, Number 98, Nguy Nhu Kon Tum Street, Nhan Chinh Ward, Thanh Xuan District, Hanoi City.	Italian DPO Rosy.cinefra@nttdata.com
<b>UAE</b>	<b>NTT Data Middle East FZ LLC,</b>	11th Floor, Al Thuraya Tower 2, Dubai Internet City, P.O. Box 500536, Dubai, UAE	Privacy.office_emea@nttdata.com
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