



## Associate Privacy Notice

Last updated: 1 February 2023, approved by Stephanie Higgins, Chief Privacy and Data Ethics Officer

### What is the purpose of this notice?

This Associate Privacy Notice ("Notice") outlines how Personal Information of Associates is collected, managed and Processed by Cognizant. Cognizant is committed to handling the Personal Information of its Associates in an appropriate and lawful manner. This Notice sets out the minimum requirements for ensuring that the Personal Information of Associates is collected, used, retained and disclosed in a secure and compliant manner.

### What other rules or notices apply?

In some cases, local laws and regulations that apply to the Processing of Personal Information may be more restrictive than this Notice. Where this is the case, the more restrictive requirements will apply. Where required by local laws, Cognizant will provide you with additional privacy notices or information. In addition, this Notice may be supplemented from time to time with more specific privacy information or notices, for example when you use particular Cognizant apps or portals.

### Contacts

For general information regarding privacy at Cognizant, please refer to the [Global Privacy Page](#). Any questions, concerns or complaints about the operation of this Notice should be addressed to the relevant talent manager, local HR representative, recruiter or data protection officer (see Contact Us section below). You can find the most up-to-date version of this Notice on the [Global Privacy Page](#) or you may contact us if you do not have access to this site.

### Who is this notice directed to?

This Notice applies between you, as a Cognizant Associate, and the Cognizant company that employs you, employed you or to which you have made an employment related enquiry, expressed an interest or submitted your Personal Information, resume or job application. If you are unsure as to which Cognizant company is applicable you, please Contact Us (see Contact Us section below). This Notice applies to all Associates (which includes individual contractors, please see the definitions section below for more detail), with regards to your Personal Information. This Notice does not apply to Personal Information belonging to vendors, clients, or third party suppliers engaged with or by Cognizant. Those standards are set out in Cognizant's Client and Supplier Privacy Statement.

### What are we going to tell you in this notice?

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Capitalized terms are defined at the end of this Notice, in the [Definitions](#) section.



## How we collect and use your Personal Information

Cognizant will only collect Personal Information relating to Associates or, for HR reasons, their nominated contacts, to the extent that it is required for a particular purpose or purposes, in the context of its business. Read about the purposes in the next section “Why we need to collect your Personal Information”.

Cognizant may collect any or all of the following types of Personal Information about Associates as part of their employment or engagement:

<b>Personal Information Category</b>	<b>Examples of Personal Information we may collect within each category include:</b>
Identity information	Title, full name, gender, citizenship, nationality, marital status, date of birth, photograph, age, biometric data, passport or other unique ID number, and proof of eligibility to work.
Contact details	Home and work address, phone number(s), email address(es), emergency contacts and nominated contacts.
Personal and family details	Place of birth, nationality, marital status, dependent information, languages, family composition, passport and visa details, hobbies and interests and other information that an Associate volunteers in their resume, cover letter or by participating in an internal networking or affinity group (e.g., Yammer) (which could involve the disclosure of data about religion, ethnicity or sexual orientation).
Travel and relocation information	Government issued IDs, visa details, passport, work permits, itineraries, preferences, emergency contacts.
Health information	Disabilities, sickness absence records, accident reporting, occupational health information, meal preferences and food allergies, blood group data and, if required by certain clients, blood and alcohol drug testing.
Career management and development information	Date of hire, employee category, full-/part-time status, education and qualifications, language ability, references, background checks (including criminal records, directorship and credit checks, where permitted by local law), competency profile, professional experience, membership of professional bodies, and appraisal information.
Government identification details	Copies of government issued identification and other government documents.
Compensation and benefits Information	Current and past salary details, records of your benefits entitlements and utilization, bank account information.
Employment contract or engagement Information	Presence and absence, work schedules, responsible duties, marketing involvement and initiatives, employee Associate ID, time recording, vacation, maternity/paternity leave, secondments, performance evaluations, training and learning, including certain personality tests, career progression and promotion, complaints, disciplinary proceedings and grievances.
Financial Information	Bank account number, tax/social security number, remuneration, bonuses, benefits, expenses, pensions, corporate and personal credit card details, payments to family and dependents and court judgments.
Data related to use of and access to facilities and corporate assets	Time and location of entry and exit, access to restricted zones and security camera footage data related to access to and usage of office equipment and corporate assets including fixed and mobile phones, computer systems, email and the intranet/internet, location identifiers, multifunctional devices, cost recovery systems, document management systems, car service pick up and drop off logs, contact management systems and online databases.

Termination of employment or engagement or retirement Information	Notice periods, reasons for leaving, exit interviews and references.
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We receive Personal Information about you directly from you as well as from other sources (such as recruitment agencies, job portals, referral programs, Cognizant applications and portals), including your usage of Cognizant systems (such as onboarding process, internally developed applications), Cognizant benefits providers and third parties such as past employers and clients.

**Personal Information of others provided by you.** In certain situations, including administration of pension and/or retirement plans and health insurance programs and schemes, travel on international assignments, as part of your benefits, and as a contact in emergency, you may provide to us the Personal Information of others (e.g. your next of kin, beneficiaries). It is your responsibility to inform the nominated individual about the processing of their Personal Information for the described purposes and to confirm, if required by law, that they have given their permission.

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### Why we need to collect your Personal Information

#### **Purposes**

Cognizant uses Associates' Personal Information for a variety of purposes. The most common uses of Personal Information are:

- Determining eligibility for employment, including verification of references and qualifications and other background checks;
- Administering pay and Associate recognition programs in the nature of rewards, incentives and/or benefits;
- Providing training and education;
- Responding to Associate requests
- Providing employment references;
- Investigating complaints and issues;
- Processing work-related claims such as health or medical insurance;
- Performance reviews and career development;
- Relocation and corporate travel;
- Business continuity management;
- Security and compliance with law; and
- Developing resource plans to meet business demands.

An extensive list of the purposes for which we are collecting your Personal Information is set out in the table below. Where Cognizant wishes to use Personal Information for a new purpose that has not been notified to the Associate, where required by law, Cognizant will notify the Associate of the new purpose.

#### **Legal Basis for Processing**

Cognizant will Process Personal Information relating to Associates where it is required by law, necessary for the performance or administration of your contract of employment, or where it has a legitimate business interest in doing so. Cognizant will Process Sensitive Personal Information where it is necessary for the purpose of carrying out a legal obligation or exercising your specific rights or those of Cognizant with respect to your employment with Cognizant. Cognizant will obtain your consent to Process your Personal Information where it is required to do so by local law, and where required, for any new or additional purpose.

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Under local law, to the extent that Processing is based on consent, Associates may be entitled to withdraw consent to the Processing of their Personal Information. Associates who wish to withdraw consent should contact us (see [Contact Us](#) section below).

The primary legal basis of Processing is set out in the table below.

Purpose of Use	Legal Reason for Processing
<i>For the hiring process</i>	
Recruitment, including assessing suitability for roles, notifying you about opportunities, verifying eligibility to work, obtaining references and screening educational and professional background data prior to and in the course of employment, not including criminal record checks.	<ul style="list-style-type: none"> <li>• Necessary for the performance of your employment contract.</li> <li>• Necessary for Cognizant's legitimate interest for evaluating candidacy.</li> </ul>
Criminal record checks prior to and in the course of employment.	<ul style="list-style-type: none"> <li>• Necessary for the performance of your employment contract where authorized by, and in accordance with, local law.</li> </ul>
<i>For compliance with legislation and policies</i>	
Managing, monitoring and investigating compliance with all relevant legal, regulatory and administrative obligations and responsibilities, whether in the jurisdiction where you are based or elsewhere.	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legal obligations as an employer and as a business entity.</li> <li>• Necessary for Cognizant's legitimate interest for monitoring compliance with regulatory obligations.</li> </ul>
Monitoring and investigating compliance with Cognizant policies.	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests to ensure compliance with our policies.</li> </ul>
<i>For administration of your employment</i>	
Personnel administration including maintaining contact information (and emergency contact information) for all Associates.	<ul style="list-style-type: none"> <li>• Necessary for the performance of your employment contract.</li> <li>• Necessary for Cognizant's legal obligations as an employer.</li> <li>• In the event of an emergency, to protect the vital interests of the data subject.</li> </ul>
Managing and reporting on disciplinary matters, grievances, queries and complaints, absences, and the termination of employment or engagement (including provision of references).	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests (to comply with its responsibilities as an employer and to run a successful and efficient business).</li> </ul>
Managing and reporting on sickness absence, occupational health services, maternity and paternity leave, or other type of statutory or contractual leave, the health, safety and well-being of workers (including statutory health and safety reporting).	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legal obligations as an employer (for statutory entitlements).</li> <li>• Necessary for Cognizant's legitimate interests (to comply with its responsibilities as an employer and to run a successful and efficient business).</li> </ul>
Monitoring and reporting for equal opportunities, diversity and inclusion purposes.	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legal obligations as an employer and to comply with employment law.</li> <li>• Necessary for Cognizant's legitimate interests (to comply with its responsibilities</li> </ul>



	as an employer and to run a successful, efficient and diverse business).
Administration of salaries, wages and benefits, management and execution of occupational pension, life, disability and retirement insurance schemes (including for relevant dependents), and the reimbursement of expenses.	<ul style="list-style-type: none"> <li>• For statutory entitlements, necessary for Cognizant's legal obligations as an employer.</li> <li>• Necessary for the performance of your employment contract.</li> </ul>
Management of Associates, including performance reviews, training and career planning, competency and professional qualifications, promotions and restructuring.	<ul style="list-style-type: none"> <li>• Necessary for the performance of your employment contract.</li> </ul>
Work scheduling (both administratively and organizationally), planning, drafting and managing working schedules or tasks.	<ul style="list-style-type: none"> <li>• Necessary for the performance of your employment contract.</li> </ul>
Managing relocations, rebadging, transfers of undertaking, secondments, international assignments and work-related travel.	<ul style="list-style-type: none"> <li>• Necessary for the performance of your employment contract.</li> <li>• Necessary for Cognizant's legitimate interests (to comply with its responsibilities as an employer and to run a successful and efficient business).</li> </ul>
<i>For organizing and maintaining our business structure</i>	
Development of central databases with respect to the Personal Information of all Associates, including databases used by subsidiaries or branch offices for human resources management.	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests (to comply with its responsibilities as an employer and to run a successful and efficient business).</li> </ul>
Maintaining and ensuring the communication between Cognizant offices and its Associates and clients.	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests (to comply with its responsibilities as an employer and to run a successful and efficient business).</li> </ul>
Business development	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests (to run a successful and efficient business).</li> </ul>
Preparation and provision of services to clients and potential clients.	<ul style="list-style-type: none"> <li>• Necessary for the performance of your employment contract.</li> </ul>
<i>For Security &amp; Business Continuity</i>	
Management of access controls and usage of buildings and facilities (including CCTV and parking lots).	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests (to comply with its responsibilities as an employer and to run a safe, secure and efficient business).</li> </ul>
Management of access to and usage of office equipment and resources including but not limited to telephones, mobile phones, laptops and portable devices, multifunctional devices and more generally the computer network and applications.	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests (to comply with its responsibilities as an employer, to protect Cognizant's finances and help prevent fraud).</li> </ul>
Maintaining the security of Cognizant's and its client's networks and information and intellectual property.	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests (to run a successful and efficient business).</li> </ul>
Managing business continuity such as monitoring and accessing files and email after an Associate's departure.	<ul style="list-style-type: none"> <li>• Necessary for Cognizant to comply with its legal obligations as an employer.</li> </ul>

	<ul style="list-style-type: none"> <li>Necessary for Cognizant's legitimate interests (to run a successful and efficient business).</li> </ul>
Detecting, preventing or otherwise addressing security, fraud or technical issues.	<ul style="list-style-type: none"> <li>Necessary for Cognizant's legitimate interests (to run a successful and efficient business and help prevent fraud).</li> </ul>
Management of access controls and usage of buildings and facilities (including CCTV and parking lots).	<ul style="list-style-type: none"> <li>Necessary for Cognizant's legitimate interests (to comply with its responsibilities as an employer and to run a safe, secure and efficient business).</li> </ul>

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### **To whom we give your Personal Information**

**Disclosure within the Cognizant group of companies.** Cognizant is a global company and your Personal Information may be shared with or accessed by other companies within the Cognizant group.

**Disclosure to third parties.** Cognizant may also share your Personal Information:

- With clients and potential clients, in the course of business and business development and with clients for their evaluation before deployment on projects or to prepare for transfers or rebadging exercises;
- With government bodies, including tax and social security authorities, to comply with applicable laws (including employment and tax laws), to obtain licenses or approvals, and upon request during an audit or assessment;
- With suppliers, subcontractors and service providers, to maintain an efficient and commercially viable business, including technology, telecom, internet providers;
- With travel agents, visa agencies and other preferred suppliers, to manage the corporate travel and/or corporate transfers of Associates (whether in relation to an affiliate, client or third party supplier), including visa processing and disclosure for other immigration purposes;
- With professional advisers, consultants, and employment and recruitment agencies, to conduct background verification and reference checks, administer benefits and payroll, deal with disciplinary and grievance issues and maintain emergency contact details;
- With our legal advisors and external auditors for legal advice and to conduct business audits;
- With credit reference agencies and background verification agencies, to conduct credit checks and background verification and reference checks;
- With service providers for business continuity management and contingency planning in the event of business disruptions; and
- With prospective sellers or buyers and their advisers in the event that Cognizant merges, acquires or sells any business or assets.

The third parties with whom we share your Personal Information may in some instances independently determine the purposes and uses of your Personal Information (e.g. an airline, a corporate credit card company or a benefits provider); in such cases, the recipient's own privacy policy will govern their use of your Personal Information.

**Disclosure without notification.** There may be circumstances where Cognizant discloses Personal Information to third parties without notifying Associates. These circumstances could include:

- Where the information is publicly available;
- Where Cognizant is required to do so by law or by order of a court or tribunal, or where Cognizant has a good faith belief that such disclosure is reasonably necessary to comply with a legal obligation, process or request;
- Where it is alleged by a law enforcement authority that an Associate is guilty of a criminal offence, or is civilly liable in a legal action, and Cognizant has a good faith belief that any disclosure is necessary to comply with a legal process or request.
- Where Cognizant is legally required to, or has a good faith belief that such disclosure is reasonably necessary to protect the rights, property or safety of Cognizant, its Associates and vendors, clients, customers of clients, third parties or the public as required and permitted by law.

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### **International transfer of your Personal Information**

Due to the global nature of Cognizant's business, Personal Information may be shared, disclosed and transferred between the various Cognizant group companies where such transfers are required for legitimate business reasons. Where Cognizant transfers your Personal Information internationally, which may include transferring Personal Information outside of Europe, Cognizant will comply with applicable legal requirements. Where required we will sign a data transfer agreement with the recipient of the Personal Information, which in the case of European Personal Information may include the [Standard Contractual Clauses](#).

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### **How we monitor your activities**

Where permitted by local law, Cognizant may monitor the activities of Associates at Cognizant or client facilities using CCTV, particularly where Associates work in a client-controlled environment. Where required, signage will indicate which areas are subject to such monitoring. Recorded images are destroyed in accordance with our retention policy, unless they are required for initiating disciplinary investigations or proceedings or are required for criminal or other investigations (including circumstances where we are required to provide such information to clients for the purposes of their investigations).

In addition to the above and where permitted by local law, Cognizant may monitor its company assets, including computers, telephones, fax machines, voice mail systems, etc., and its networks, including intranet/internet access, email, applications, etc., and the activities of Associates while accessing or using such office equipment or networks as more fully set out in our Acceptable Use Policy. If you have further questions, please contact us (see [Contact Us](#) section below).

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### **How long we retain your Personal Information**

Cognizant will retain Personal Information for as long as necessary for the purpose or purposes for which it was collected, in accordance with local law and as set out in our [Retention policy](#).

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## How we protect your Personal Information

Cognizant implements appropriate security measures designed to prevent unlawful or unauthorized Processing of Personal Information and accidental loss of or damage to Personal Information. Cognizant maintains written security management policies and procedures designed to prevent, detect, contain, and correct violations of measures taken to protect the confidentiality, integrity, availability, or security of your Personal Information. These policies and procedures assign specific data security responsibilities and accountabilities to specific individuals, include a risk management program that includes periodic risk assessment and provide an adequate framework of controls that safeguard your Personal Information.

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## What are your rights?

Cognizant systems allow Associates to check and update certain Personal Information. It is the responsibility of all Associates to ensure that their Personal Information is kept up-to-date. In certain circumstances, Associates have the right to access their Personal Information, verify and challenge the accuracy and completeness of their Personal Information and have it corrected, amended or deleted if inaccurate and, in limited circumstances, object to processing of their Personal Information. Cognizant may require Associates to provide reasons or evidence to justify the amendment of Personal Information held by Cognizant. Associates can exercise these rights by contacting us per the Contact Us section below. In addition, where applicable, Associates may have the right to lodge a complaint with their local data protection authority.

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## Contact Us

Any questions, concerns or complaints about the operation of this Notice should be addressed to the relevant talent manager or local HR representative in the first instance. If you do not have a talent manager or a local HR representative, please contact the Data Protection Officer at [DataProtectionOfficer@cognizant.com](mailto:DataProtectionOfficer@cognizant.com). In addition, Associates may submit concerns or complaints about Cognizant's privacy practices to the compliance helpline at [Cognizant Compliance Portal](#) or the Data Protection Officer at [DataProtectionOfficer@cognizant.com](mailto:DataProtectionOfficer@cognizant.com). In addition to contacting us, in certain countries you have the right to lodge a complaint with your local data protection authority if you so choose.

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Note Cognizant may update this Notice from time to time. Any such updates will be effective from the date on which they are notified to associates or posted on the [Global Privacy Page](#). Associates should check this Notice from time to time and take notice of any changes made.

## Definitions

- **“Associate”** means any current, past and prospective employees, individual contractors or other members of personnel of Cognizant.
- **“Cognizant”** means Cognizant Technology Solutions Corporation, a public limited company incorporated in Delaware, United States with a registered address at 500 Frank W Burr Blvd, Teaneck, NJ 07666 USA, and its global affiliates and subsidiaries, including the Cognizant company which employs or engages you or to whom you have applied for a job.



- **“Personal Information”** means any information or combination of information, in any form or medium, that can identify an Associate. Examples include name, email address, physical address, phone number, date of birth, age, home address, personal preferences, behavioral information, government issued IDs, IP address, hardware identifiers, etc.
- **“Sensitive Personal Information”** means Personal Information, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. Examples of Sensitive Personal Information in various jurisdictions may include social security numbers, driver’s license numbers, passwords, passports, tax IDs, financial account and credit card numbers, health information (including Protected Health Information (PHI)), biometric identifiers, racial or ethnic origin, and information about political opinions, religious beliefs, trade union membership, criminal history, sexual orientation or blood group.
- **“Process/Processed/Processing”** means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collecting, recording, storing, deleting, viewing, accessing, amending, using or disclosing the Personal Information.

Note, where we have used words such as “include,” “including,” “for example,” or “such as” in this Notice these are meant to be examples and not exhaustive lists.

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