

## Candidate Privacy Notice

Last updated: 31 December 2022

### Introduction

Cognizant Technology Solutions Corporation and its affiliated companies (“Cognizant” “we” or “us”) are firmly committed to protecting your privacy. This Candidate Privacy Notice (“Notice”) explains what we do with Personal Information we collect during and after the recruitment process through the Careers portal on the Cognizant websites (“**Site**”) or by any other means. This Notice applies to individuals who apply for employment (whether fulltime or on contract basis), internship or assignment with Cognizant, including those individuals who attend a Cognizant recruitment event.

As a global company, Cognizant has a number of legal entities in different jurisdictions which are responsible for the Personal Information which they collect. The data controller for Personal Information collected during the recruitment process is the Cognizant company in your jurisdiction to whom you submit your application (all Cognizant companies can be found via this link: [Cognizant Worldwide](#)). If you are unsure as to which Cognizant company is applicable to you, please contact us (see Contact Us section below).

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.

Please note that the Site is hosted by Phenom People Inc.

The Site (and recruitment process) is not intended for minors under the age of 16.

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

[How we collect and use your Personal Information](#)  
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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

#### **Types of Personal Information**

We may collect the following general types of information about you:

**Personal Information** – During the recruitment process, we collect information from you in connection with your application. Information we collect includes:

- Name, address, telephone number, email address and other contact information
- Information you submit in resumes/CV's/letters, including but not limited to employment history, academic qualifications, professional qualifications, and skills
- Whether or not you were previously employed by Cognizant, including employee ID

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- Other relevant information, such as employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships, professional and other work-related licenses, permits and certifications
- Information generated by interviewers and recruiters, based on their interactions with you, e.g., via a recruitment or campus hiring event, or basic Internet searches
- Information provided by third-party recruiters, staffing companies or executive search agencies, where applicable
- Recommendations provided on your behalf by others
- Documentation required under immigration laws
- Personal Information submitted or generated as a result of psychological, technical or behavioral assessments undertaken (including the involvement of remote video proctoring); you will receive more information about the nature of such assessments before your participation in any of them
- Personal Information submitted or generated as a result of live video interviews; you will receive more information about the nature of such interviews before your participation in them
- Your Public LinkedIn profile, if you choose to import your profile to get personalized job recommendations
- Username and password (if available on the Site)

Should you be successful for a role, we would then ask you to provide information about third parties, such as references or contacts that you provide to us. You are responsible for ensuring that you have permission to submit any such information and that such individuals are aware that their information will be available to Cognizant or its clients for the purposes of taking up references.

**Sensitive Personal Information** – We do not require you to provide any Sensitive Personal Information during the recruitment process. Nonetheless, should you be successful for a role, we - where permitted by applicable law - may then ask you to provide some Sensitive Personal Information and/or identification numbers to enable us to comply with legal requirements at a national level (e.g., in relation to equal opportunities legislation).

In addition, you may also be subject to a background check, where justified by the particular role you are applying to and subject to the applicable laws of the country you are located in. The content of background check information varies by country to comply with local requirements, but may include information gathered from publicly available sources, your former employers or colleagues, schools you have attended, credit reporting agencies, and criminal records databases. You will receive more information about the nature of such a background check before it begins and no such checks will be undertaken without your express prior consent, where this is required by applicable law.

Otherwise, we ask that you avoid submitting information which may qualify as sensitive information under applicable law, except where such information is legally required.

**Aggregated information** – This is information that is aggregated and therefore not uniquely personal to you, but which refers to selected population or geographic characteristics, age, gender, occupation, preferences, and interests in accordance with applicable laws.

**Behavioral information** – We and our service provider (Phenom People Inc) use “cookies” and similar technologies on the Site. For more information and to manage your settings, please see the [Career Site Cookie Policy](#) and the [Cognizant Cookie Notice](#).

Any information you submit must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may make you ineligible for employment.

*Sources from which the Personal Information originates*

We may collect information about you directly from you or from other sources (where permissible and in accordance with applicable law):

- From you directly or from your use of the Site
- From referrers, referees, and former employers
- From conversations with recruiters and other Cognizant associates or representatives, as well as from internet searches that these individuals may perform, or data that they may obtain from job search or professional networking websites (e.g., LinkedIn, etc) where you may have made data about yourself publicly available
- From third party recruiters, staffing companies or executive search agencies that are contracted by Cognizant
- From background checks, as applicable. Where permitted by law, we may contract with a third party to perform a pre-employment background screening. You will receive more information about the nature of such a background check before it begins and no such checks will be undertaken without your express prior consent, where this is required by applicable law.

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## **Why we need to collect your Personal Information**

### **Purposes**

We will process your Personal Information (including, without limitation and where permitted, your Sensitive Personal Information) for our business purposes, including our recruitment, management and planning purposes, including:

- assessing your suitability for the role for which you are applying as well as future roles that may come available
- management and administration of your application
- facilitate communication, responding to your queries
- verifying eligibility to work
- perform data analytics, including of our candidate pool, to improve our recruitment process and the Site
- notifying you about opportunities (if you signed up)
- to comply with or monitor compliance with applicable law

We may collect and aggregate data from your Personal Information to enable us to monitor and improve our services.

### **Legal basis for processing**

Cognizant will Process Personal Information where it is required by law, necessary for the prospective employment contract, or where it has a legitimate interest (which is not overridden by your data protection interests or fundamental rights and freedoms, particularly taking into consideration the safeguards that we put in place).

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 prospective 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. For example, we will obtain your prior consent, if this is required under applicable law, for certain types of processing regarding Sensitive Personal Information and Personal Information regarding criminal offences and convictions.

Under local law, to the extent that Processing is based on consent, you may be entitled to withdraw consent to the Processing of their Personal Information. If you wish to withdraw consent you can contact us (see Contact Us section below).

The primary legal basis is set out in the table below:

| Purpose of Use                                                                                                                                                     | Legal Reason for Processing                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To assess your suitability for employment for the role for which you are applying (excluding background checks), as well as future roles that may become available | <ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests to ensure that it recruits the appropriate employees</li> <li>• To take steps prior to entering in an employment contract with you, where you are considered for employment</li> </ul>                        |
| To manage and administrate your application                                                                                                                        | <ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests to ensure that it recruits the appropriate employees</li> <li>• To take steps prior to entering in an employment contract with you, where you are considered for employment</li> </ul>                        |
| To facilitate communication                                                                                                                                        | <ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests to ensure proper communication with you and within the organization</li> <li>• To take steps prior to entering in an employment contract with you, where you are considered for employment</li> </ul>         |
| Verifying eligibility to work (excluding background checks)                                                                                                        | <ul style="list-style-type: none"> <li>• To take steps prior to entering in an employment contract with you, where you are considered for employment</li> <li>• Necessary for Cognizant's legitimate interests to comply with applicable immigration and/or employment laws and regulation</li> </ul> |
| Perform data analytics, including of our candidate pool, to improve our recruitment process and the Site                                                           | <ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests to ensure that it improves its recruitment processes</li> </ul>                                                                                                                                               |
| If you register/sign up on the Site, we will enter you in a database to receive job alerts and/or information on job events                                        | <ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests to ensure that it recruits the appropriate employees</li> </ul>                                                                                                                                               |
| To comply with or monitor compliance with applicable law or regulation                                                                                             | <ul style="list-style-type: none"> <li>• Necessary to comply with Cognizant's legal obligations as a business entity</li> <li>• Necessary for Cognizant's legitimate interest to protect the rights and interests of Cognizant, our employees, candidates and others</li> </ul>                       |

If we ask you to provide Personal Information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not (as well as of the possible consequences if you do not provide your Personal Information).





If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us at [dataprotectionofficer@cognizant.com](mailto:dataprotectionofficer@cognizant.com).

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### **Who will have access to your Personal Information**

In general, access to your Personal Information will be restricted to the relevant people in Cognizant who need it for the purposes set out in this Privacy Notice (e.g., your potential future managers and direct colleagues, recruitment, HR, and IT).

We do not sell your Personal Information or share it with a third party for cross-context behavioral advertising, but may disclose your Personal Information, as required and in accordance with applicable laws, as follows:

- **Third party service providers:** We use a third-party service provider (namely Phenom People Inc.) who is located in the United States (300 Brookside Avenue, Building 18, Suite 200, Ambler, PA 19002) to assist us in managing our Site and who may have access to your Personal Information. We also use another third-party service provider (Tal view Inc.) who is located in the United States (2033 Gateway Place, San Jose CA 95110) to assist us in the recruitment process and who may have access to your Personal Information. Your Personal Information may also be shared with other third-party service providers who have been retained to provide services on behalf of Cognizant, such as for the storage of data or the maintenance of our Site.
- **Cognizant Affiliates:** Due to the global nature of Cognizant's business, Personal Information may be shared, disclosed and transferred between the various Cognizant Affiliates where such transfers are required for legitimate business reasons, e.g., recruiters, hiring managers, talent managers and administrative and IT functions may be located in other countries than the country where the position you are applying for is based.
- **Clients:** Where applicable, your Personal Information, such as your CV, may be shared with the relevant client for project related purposes.
- **Potential mergers or acquisitions:** Following an acquisition of any or all of Cognizant's business operations, whether by way of acquisition of shares or stock, merger, consolidation, or asset purchase and regardless of any possible new company name, we will notify you about any changes in the data controllership.
- **Insolvency proceedings:** If Cognizant becomes the subject of insolvency proceedings, whether voluntary or involuntary, Cognizant or its liquidator, administrator, receiver or administrative receiver or similar officer may transfer, license or otherwise dispose of your Personal Information in a transaction approved by the court of competent jurisdiction. We will notify you of any relevant sale of our business operations by a posting on the Site or via email.
- **Legal obligations:** We may disclose your Personal Information where required to comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant.
- **Public bodies and authorities:** We may disclose your Personal Information pursuant to a request from a governmental or regulatory entity/body or if we believe in good faith that such disclosure is necessary to (1) comply with legal or regulatory requirements or for the purposes of compliance with legal process; (2) prevent crime; (3) prevent any terrorist activity or threat to national security; (4) protect the personal safety or wellbeing of users of the Site or any other person.





- **Legal proceedings:** Cognizant may disclose your Personal Information to the extent permitted by appropriate law where necessary to establish, exercise or defend against potential, threatened or actual legal claims.
- **Vital interests:** We may disclose your Personal Information where necessary to protect your vital interests or those of another person.

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### **International Transfers of your Personal Information**

As further detailed above under the section '[Who will have access to your Personal Information](#)', due to the global nature of Cognizant's business, Personal Information may be shared, disclosed and transferred between the various Cognizant Affiliates and third parties where such transfers are required for legitimate business reasons. Such companies may be located outside your country of residence. The level of protection for Personal Information is not the same in all countries; however, we will take reasonable steps and implement measures as described in this Notice to keep your Personal Information secure. In addition, we will ensure that any international transfers of your Personal Information will take place in accordance with the requirements of applicable law.

In particular, unless otherwise notified to you, any transfers of your Personal Information from within the European Economic Area (EEA), Switzerland and/or the United Kingdom (UK) (as applicable) to Cognizant Affiliates or third parties located outside the EEA, Switzerland and/or the UK (as applicable) will be based on an adequacy decision or governed by the [Standard Contractual Clauses](#).

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

We will retain Personal Information for the period necessary to fulfil the purposes outlined in this Notice, unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods are (i) the duration of the application process, (ii) as long as we have an ongoing relationship with you, (iii) as required by a legal obligation to which we are subject; and (iv) as advisable in light of our legal position (such as in relation to statutes of limitations, litigation or regulatory investigations).

If you become an employee of Cognizant, your Personal Information will be retained in accordance with the Associate Privacy Notice.

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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. Where we contract with third parties to provide services that may enable them to

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access your Personal Information, we require them by contract to have similar security controls in place.

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### **What are your rights**

To the extent these rights are provided to you by applicable law, you may:

- request **access** to your Personal Information or to know the specific pieces of Personal Information that we collect, use and disclose about you, or to **correct, update or request deletion** of your Personal Information. You can do so by contacting us at [SAR@cognizant.com](mailto:SAR@cognizant.com).
- **object to processing** of your Personal Information, ask us to **restrict processing** of your Personal Information or **request portability** of your Personal Information. Again, you can exercise these rights by contacting us at [SAR@cognizant.com](mailto:SAR@cognizant.com).
- If we have collected and process your Personal Information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your Personal Information or to initiate a lawsuit due to the breach of your Personal Information at the regional court with geographical jurisdiction based on your residence or based on the seat of the data controller. Following are the contact details for data protection authorities in:
  - the European Economic Area – Click [here](#);
  - the UK - Click [here](#);
  - Switzerland - Click [here](#);

We will not discriminate against you for exercising these rights. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Complying with all or part of your request may be denied or limited by Cognizant if it would violate another person's rights and/or as otherwise permitted by applicable law.

Before responding to a request, we reserve the right to verify and authenticate your identity and the information that your request relates to. Cognizant may ask for your: (a) First, Middle (if available), and Last Name; (b) Physical Address; (c) Month/Year of Birth; (d) Valid Email Address; and (e) Valid Telephone Number.

Authorized agents will be required to submit a written authorization document that includes your name, address, telephone number and valid email address, signed and dated by you, appointing the individual as your authorized agent, to act on your behalf. Cognizant may also request you to verify your own identity with Cognizant and confirm that you have provided the authorized agent permission to submit the request. For the safety and security of your information, requests submitted to Cognizant by an authorized agent will require a direct method of communication, preferably a valid email address, with you, to fulfill the request. We may deny a request from an authorized agent who does not submit sufficient proof to act on your behalf.





If an archival copy of your Personal Information is required to be retained by applicable law after receiving a request for deletion or closure of your account, we will follow the statutory term for such a retention.

If you are in California, you may exercise your privacy rights by using the email address [SAR@cognizant.com](mailto:SAR@cognizant.com) or by calling the Cognizant Ethics and Compliance Helpline toll-free at 1-866-824-4897.

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### **Contact us**

If, at any time, you have questions or concerns about the operation of this Notice or believe that we have not adhered to this Notice, please email us:

Asia Pacific: [Careers-APAC@cognizant.com](mailto:Careers-APAC@cognizant.com)

India: [Careers-APAC@cognizant.com](mailto:Careers-APAC@cognizant.com)

Continental Europe: [ChireSupportEurope2@cognizant.com](mailto:ChireSupportEurope2@cognizant.com)

Latin America: [CareersLatmSupport@cognizant.com](mailto:CareersLatmSupport@cognizant.com)

North America: [CareersNA2@cognizant.com](mailto:CareersNA2@cognizant.com)

UK & Ireland: [careersuki@cognizant.com](mailto:careersuki@cognizant.com)

In addition, you may submit concerns or complaints about Cognizant's privacy practices to the Data Protection Officer at [DataProtectionOfficer@cognizant.com](mailto:DataProtectionOfficer@cognizant.com).

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### **Changes to this Notice**

**We reserve the right to make changes to this Notice at any time. Any changes to this Notice will be posted on this page thus make sure to read this Notice before submitting your Personal Information. Substantial changes will be highlighted on the Site or may be emailed to you.**

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### **Definitions**

- **"Candidate"** means any prospective employee, individual contractor or other member 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 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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