

# PRIVACY POLICY – India

## 1. Introduction

As a globally integrated company, the business processes of the Concentrix family of companies, including Concentrix companies that conduct business under a different brand, (“Concentrix”) frequently go beyond the borders of one country. Concentrix’s global business requires communication and information systems across its worldwide operations and involves the processing, sharing and use of multiple types of information, including information that identifies, or can reasonably be used to identify, an individual (“Personal Information”). This Policy sets forth the Indian privacy principles which underlie Concentrix’s practices for collecting, using, disclosing, retaining, deleting, accessing, transferring and otherwise processing Personal Information (“Processing”).

## 2. Applicability

This Policy applies to the Processing of Personal Information anywhere in the world by Concentrix and its employees, suppliers, business partners and contractors who Process Personal Information for or on behalf of Concentrix. This Policy is subject to compliance with both contracts and applicable laws and regulations in Indian jurisdiction, including, without limitation, laws and regulations defining and governing the Processing of Personal Information in any other applicable region, country, state, or city. This Policy is also subject to, and supplemented by, Concentrix’s policies, notices, guidelines and documented processes and instructions for Processing Personal Information in specific circumstances, including, without limitation, the Processing of Personal Information:

- I. pertaining to Concentrix employees, employees and customers of Concentrix’s clients, employees of vendors and business partners, and/or other individuals (“Data Subjects”) located in India;
- II. for specific Concentrix websites, platforms, IT applications or tools;
- III. in compliance with PCI and certain other industry standards and practices; and
- IV. in compliance with applicable laws and regulations.

## 3. Privacy Policy Statement

Concentrix is committed to protecting the privacy and confidentiality of Personal Information pertaining to Data Subjects to the extent their Personal Information is Processed by or on behalf of Concentrix and / or Concentrix Clients. The privacy policy as an Intermediary and an employer set forth in this Policy enable Concentrix to securely Process Personal Information fairly, appropriately, and in a legally permissible manner in India.

## 4. Intermediary

Users and / or Employees of Concentrix acting on behalf of Concentrix and / or Concentrix clients, will not process, host, display, upload, modify, use, publish, transmit, store, update or share any information that:

- (i) belongs to another person and to which the user/employee does not have any right;
- (ii) is obscene, pornographic, pedophilic, invasive of another's privacy including bodily privacy, insulting or harassing on the basis of gender, racially or ethnically objectionable, relating or encouraging money laundering or gambling, [or an online game that causes user harm,] or promoting enmity between different groups on the grounds of religion or caste with the intent to incite violence;
- (iii) is harmful to child; (iv) infringes any patent, trademark, copyright or other proprietary rights; (v) deceives or misleads the addressee about the origin of the message or knowingly and intentionally communicates any misinformation or information which is patently false and untrue or misleading in nature [or, in respect of any business of the Central Government, is identified as fake or false or misleading by such fact check unit of the Central Government as the Ministry may, by notification published in the Official Gazette, specify];
- (iv) impersonates another person;
- (v) threatens the unity, integrity, defence, security or sovereignty of India, friendly relations with foreign States, or public order, or causes incitement to the commission of any cognizable offence, or prevents investigation of any offence, or is insulting other nation;
- (vi) contains software virus or any other computer code, file or program designed to interrupt, destroy or limit the functionality of any computer resource;
- (vii) is in the nature of an online game that is not verified as a permissible online game;
- (viii) is in the nature of advertisement or surrogate advertisement or promotion of an online game that is not a permissible online game, or of any online gaming intermediary offering such an online game;
- (ix) violates any law for the time being in force;

In its role as an Intermediary / Processor, Concentrix provides customer support services on behalf of its clients that require employees to access and use communications and technology systems ("IT Systems") provided by Concentrix and/or its clients.

Concentrix has contractual and legal obligations to its employees and clients to protect their personal and confidential information, and to ensure that personal and confidential information on IT Systems is only used for approved purposes and only accessed by employees who are granted access to the IT Systems.

Concentrix's security measures and other security requirements for protecting personal and confidential information are set forth in agreements with Concentrix employees and in Concentrix's policies and procedures ("Security Requirements").

In order to enhance Concentrix's security measures for monitoring and enforcing compliance with the Security requirements, Employee/User/Customer of the client understand and appreciate that Concentrix will need to access, retain and process his/her personal information in connection with the following security measures ("Enhanced Security Measures") which are reasonably required for the business:

- a. Use of facial recognition technology to verify that the person who is attempting to access IT Systems is an authorized party;
- b. Use of a camera installed on user's/Employee's work station or, if applicable, the computer he/she uses to work from home, to take pictures at frequent and variable intervals in order to monitor his/her compliance with the Security Requirements any time he/she attempt to access or have access to IT Systems; and
- c. Use of automated processes to monitor recorded pictures of User/Employee in his/her work space to detect and attempt to remediate any potential violations of the Security Requirements.

The following categories of personal information will be processed in connection with the Enhanced Security Measures:

- User/Employee name, employee ID, Concentrix site, limited biometric data used for facial recognition, recorded pictures of me, recorded pictures of user's/employee's home's work space if he/she works from home, and data related to his/her behavior and compliance or potential non-compliance with Security Requirements
- Concentrix may provide his/her personal information to his/her supervisor and other Concentrix employees for purposes of investigating potential security incidents and any potential disciplinary action resulting from such incidents, Concentrix's vendors and subcontractors for the sole purpose of providing the Enhanced Security Measures, and potentially to a client of Concentrix for an investigation of a potential security incident, in compliance with the terms of this Acknowledgement and Agreement.
- Concentrix will implement appropriate safeguards to secure and protect user's/employee's biometric data and other personal information collected, retained or otherwise processed in connection with the Enhanced Security Measures.
- Concentrix will only retain User's/Employee's biometric data and other personal information for so long as he/she is providing services as an employee of Concentrix and up to one hundred eighty (180) days thereafter, or for any longer period of time required under applicable law and, when there is no longer a valid reason to retain his/her biometric data or other personal information, Concentrix will promptly and securely erase or destroy his/her biometric data and other personal information

accessed, retained or processed in connection with the Enhanced Security Measures.

## 5. Enforcement and Redressal

Concentrix has implemented and will adhere to reasonable processes and measures for monitoring and enforcing compliance with these privacy principles, including processes and measures to review and address any actual or potential failure to adhere these privacy principles.

In case of any grievance, please reach out to [cs.india@concentrix.com](mailto:cs.india@concentrix.com)

Or

refer to our whistleblowing policy at Governance Documents & Charters

Concentrix Corporation Grievance Redressal officer –

Name: Leena Palekar

Email: [DPO@concentrix.com](mailto:DPO@concentrix.com)