

## Cognizant Privacy Notice

Last Updated: 31 December 2023

### **What is the purpose of this notice?**

This Privacy Notice ("Notice") outlines how Personal Information of clients, prospective clients, former clients, visitors, vendors and other third parties we interact with ("External Individuals") is collected, managed and Processed by Cognizant. Cognizant is committed to handling the Personal Information of all External Individuals in an appropriate and lawful manner. This Notice sets out the minimum requirements for ensuring that the Personal Information of External Individuals 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 visit a Cognizant website, attend an event or use particular Cognizant apps or portals.

### **Contacts**

Any questions, concerns or complaints about the operation of this Notice should be addressed to your relevant client partner, account executive, business development contact, procurement contact or Cognizant's Data Protection Office (see Contact Us section below). This Notice may be updated from time to time. You can find the most up-to-date version of this Notice on our website at [www.cognizant.com](http://www.cognizant.com).

### **Who is this notice directed to?**

This Notice applies between you, as an External Individual, and the Cognizant company that you interact or engage with or that communicates with you in relation to services or solutions provided by Cognizant, or the Cognizant company to whom you provide or wish to provide your goods or services. If you are unsure as to which Cognizant company is applicable to you, please Contact Us (see Contact Us section below). This Notice applies to all External Individuals with regards to your Personal Information. This Notice does not apply to Personal Information belonging to Associates (as defined below) employed or contracted by Cognizant. This Notice also does not apply to Personal Information Processed by Cognizant on behalf of clients as part of Cognizant's services.

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

[How we collect and use your Personal Information](#)  
[Why we need to collect your Personal Information](#)  
[To whom we give your Personal Information](#)  
[International transfer of your Personal Information](#)  
[How we monitor your activities](#)  
[How long we retain your Personal Information](#)  
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[What are your rights?](#)  
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Capitalized terms are defined at the end of this Notice, in the [Definitions](#) section.

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## How we collect and use your Personal Information

Cognizant will only collect Personal Information relating to External Individuals 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 or Process, and has collected or Processed in the preceding year, any or all of the following types of Personal Information about External Individuals as part of its business activities:

<b>Personal Information Category</b>	<b>Examples of Personal Information we may collect within each category include:</b>
Identity information	Title, full name, photograph, gender, date of birth.
Contact details	Employer details, job title, work address, phone number(s) and email address(es), emergency contact details and number, social media handles.
Personal details	Languages and information that an External Individual volunteers in their course of dealings with Cognizant, such as through networking events (which could involve the disclosure of data about religion to facilitate prayer room access, ethnicity or sexual orientation).
Marketing information	Contact history, interactions and communications with Cognizant, events attended, Cognizant information and materials (e.g., whitepapers) provided, contact preferences.
Health information	Meal preferences, food allergies, access requirements for physically challenged.
Relationship management information	Communication and meeting dates, education and qualifications, references, professional experience, membership of professional bodies, information about complaints and feedback.
Data related to use of and access to facilities and corporate assets	Time and location of entry and exit to premises, 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.
Background screening information	Criminal history, political exposure.

We receive Personal Information about you directly from you via our websites and portals, at events you attend and when we contact you via post, email or phone and through your usage of Cognizant systems (such as client and vendor onboarding processes and internally developed applications). We may also receive Personal Information about you from other sources such as business networks and agencies, publicly available sources such as LinkedIn, media outlets, referrals, from the company that employs you, our past clients and where we purchase marketing lists.

**Personal Information of others provided by you.** In certain situations, including visiting our offices, you may provide to us the Personal Information of others (e.g., your colleagues). 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 External Individuals' Personal Information for a variety of purposes. The most common uses of Personal Information are:

- Managing client requests, projects and bidding for work;
- Marketing activities and market research;
- Managing vendor relationships and invoicing and determining eligibility of vendors including verification of references and qualifications and other background checks;
- Managing client relationships;
- Investigating complaints and issues;
- Organizing meetings and networking events;
- Business continuity management;
- Security and compliance with law, including health and safety requirements; and
- Developing resource plans to meet business demands.

In order to comply with legal and regulatory obligations and to the extent permitted or required by local law, and specifically to ensure that we can comply with applicable trade control, anti-money laundering and/or anti-bribery and corruption laws, we may carry out background screening checks on current and prospective clients, vendors and business partners, both pre and post contract. In addition to screening individuals and legal entities with whom we enter contracts, this screening may cover individuals such as directors, officers, sole traders, shareholders and other key stakeholders. The screening utilizes publicly available information, including government issued sanctions lists and media sources. The information obtained through background screening may include Personal Information regarding suspected or actual criminal behavior, criminal records or proceedings and unlawful behavior.

An extensive list of the purposes for which we may collect 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 External Individual, where required by law, Cognizant will notify the External Individual of the new purpose.

### **Legal Basis for Processing**

Cognizant will Process Personal Information relating to External Individuals where it is required by law, necessary for the performance or administration of a contract, 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 specific rights of Cognizant permitted by local law. 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. Under local law, to the extent that Processing is based on consent, External Individuals may be entitled to withdraw consent to the Processing of their Personal Information. External Individuals who wish to withdraw consent should follow the instructions received at the time of providing consent or 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
For vendor and client relationship management	
Managing requests from clients including Cognizant's bids for work, conducting such work, invoicing clients and investigating complaints and other issues.	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests (to run a successful and efficient business).</li> </ul>
Managing vendor and business partner relationships and determining eligibility of vendors and others including verification of references and qualifications and other background screening checks.	<ul style="list-style-type: none"> <li>• Necessary for compliance with Cognizant's legal obligations as a business entity.</li> <li>• Necessary for Cognizant's legitimate interests (to run a successful and efficient business).</li> <li>• Consent</li> </ul>
For compliance with legislation and policies	
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 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>
For organizing and maintaining our business structure	
Development of central databases with respect to the Personal Information of all External Individuals, including databases used by subsidiaries or branch offices for client and vendor management.	<ul style="list-style-type: none"> <li>• Necessary for Cognizant's legitimate interests (to run a successful and efficient business).</li> </ul>
Business development	<ul style="list-style-type: none"> <li>• Depending on the situation, either with the consent of the data subject, or where necessary for Cognizant's legitimate interests (to run a successful and efficient business).</li> </ul>
For Security & Business Continuity	
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 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 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>
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>

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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;
- With suppliers, subcontractors and service providers, to maintain an efficient and commercially viable business, including caterers and security contractors if you visit Cognizant's premises;
- With professional advisers and consultants;
- With 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., legal advisers and external auditors); 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 External Individuals. 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 External Individual 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 employees, contractors, job applicants, vendors, clients, customers of clients, third parties or the public as required and permitted by law.

In the preceding year, we have not sold your Personal Information or shared it with a third party for cross-context behavioral advertising.

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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 your country of domicile, 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 Personal Information originating from the European Economic Area, Switzerland and the United Kingdom, 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 External Individuals at Cognizant or client facilities using CCTV. 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 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 External Individuals while accessing or using such office equipment or networks as 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 fulfilling the purpose or purposes for which it was collected. This generally means that Personal Information will be deleted at the latest 6 years after collection unless longer retention is required for other valid reasons such as compliance with legal obligations, to resolve disputes or enforce contracts.

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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?**

Certain Cognizant systems may allow External Individuals to check and update certain Personal Information. Where applicable, it is the responsibility of all External Individuals to ensure that their Personal Information is kept up-to-date. Where permitted under applicable laws, External Individuals have the right to access their Personal Information, including to know the specific pieces of Personal Information that we collect, use and disclose, to 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 or ask for Processing to be restricted. Cognizant may require External Individuals to provide reasons or evidence to justify the amendment of Personal Information held by Cognizant. In addition, where applicable, External Individuals can ask for their data to be moved to another controller or be provided in a portable format. Where Cognizant is Processing Personal Information on the basis of consent, External Individuals can withdraw that consent at any time. However, please note that if you withdraw your consent, you might not be able to use services or features that require collection or use of such Personal Information. External Individuals can exercise these rights by contacting us per the Contact Us section below. External Individuals can also unsubscribe from marketing sent by Cognizant at any time by following the instructions received in the relevant marketing communication. We will not discriminate against you for exercising these rights.

We respond to all requests we receive from External 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.

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### **Contact Us**

Any questions, concerns or complaints about the operation of this Notice should be addressed to your main or usual Cognizant contact in the first instance (e.g. your relevant client partner, account executive, business development contact or procurement contact) or, if you do not have a Cognizant contact, to Cognizant's Data Protection Office at [DataProtectionOfficer@cognizant.com](mailto:DataProtectionOfficer@cognizant.com).



If you wish to access the Personal Information we hold about you or exercise any of your other legal rights in respect of your Personal Information, please contact [SAR@cognizant.com](mailto:SAR@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. If you are in California, you also may exercise your privacy rights by calling the Cognizant Ethics and Compliance Helpline toll-free at 1-866-824-4897.

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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 External Individuals or posted on the Cognizant website at [www.cognizant.com](http://www.cognizant.com). External Individuals 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 you or your employer contracts or communicates with.
- **“Personal Information”** is defined under applicable law but may include any information or combination of information, in any form or medium that can identify an External Individual. 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, as well as any other information deemed sensitive under applicable data protection laws.
- **“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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