

Internal Privacy Notice

Introduction

This Privacy Notice seeks to help you understand how we collect and use information about you, regardless of the legal basis of our cooperation (employment or other type of contract). It may be complemented by local polices applicable in your jurisdiction (listed below in this document) and may be updated at any time. You should review this and your local policy carefully.

The controller of your data is the GlobalLogic group company you have concluded a contract with (for contact details please check your contract).

In case of any questions the GlobalLogic Privacy Team should be contacted at: privacy@globallogic.com.

General rules on personal data/ PII processing

For more information on personal data processing in GlobalLogic group please see [the Privacy and Personal Data Protection Policy](#).

Please remember, that as a general rule, GlobalLogic does not accept any personal data/ personally identifiable information about customers of our clients – in the event a client proposes work that involves GlobalLogic in accessing, processing, reviewing, maintaining or otherwise handling personal data immediately contact the Privacy team for assistance. Send an e-mail to privacy@globallogic.com for this purpose.

Abbreviations and definitions

GlobalLogic and/or Company – means GlobalLogic Inc. and/or its affiliates, depending, in particular, on which GlobalLogic group company you conclude a contract with. Variances to this policy may apply to regulate the processing of personal data in accordance with a country's specific local laws, where they exist.

CCPA – the California Consumer Privacy Act of 2018, as amended.

GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

UK GDPR – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation),

incorporated into law in the UK as amended by the Data Protection, Privacy and Electronic Communications (Amendments, etc.) (EU Exit) Regulations 2019.

Description - what data do we process

The Company may collect two different types of information about you: (a) information you provide to GlobalLogic; and (b) information the Company collects through technology.

Personal data (personal information, personally identifiable information) is any information relating to an identified or identifiable natural person (so called “data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Non-personally identifiable information is information that does not personally identify you, including anonymous information and aggregate data.

Information collected through technology may include IP address, in certain cases also content of your e-mails / content stored on corporate tools provided to you, frequency with which you browse corporate platforms or use internal applications or may be included in e-mails sent to you to determine whether you have opened those e-mails and/or clicked on links in those e-mails. We may collect the information from use of these technical methods and associate it with your personal data. We may also process information regarding violations of our policies or the law for a purpose of an internal investigation if we receive appropriate notice and data collected during investigations. The Company may also collect information (directly or through a service provider/governmental authority) when conducting background checks upon the request of a client to check your suitability for a certain position, including criminal records etc. In each case, we act only in accordance with local laws.

We will normally collect personal data directly from you – in connection with your job-related activities, including in relation to the hours you work, the tasks you perform, any travel you undertake and the use by you of our systems and facilities. We may also collect health related information, where legally required.

Your submission of personal data is voluntary, but sometimes it may be necessary for purposes related to employment, including for the fulfilment of statutory obligations resting upon the Company. This means that failure to provide data may constitute grounds for refusal by GlobalLogic to enter into cooperation, or for GlobalLogic to take legal measures to terminate a contract or decline granting certain benefits to you.

We may sometimes collect information from third parties in appropriate circumstances and subject to applicable regulations and (where appropriate) your consent, including references from previous employers, credit reference agencies and government or other public authorities (for example tax authorities).

Use of image

Occasionally, GlobalLogic may organize or suggest to you an interesting event, e.g., conference, fairs, lecture or marketing project (“Event”), which you may voluntarily attend e.g. as a listener, participant, host, or speaker or in a different character. Sometimes also your role in our organization requires you to actively represent GlobalLogic at various types of Events.

As a rule we record Events (sometimes with a help of third party acting on our behalf), therefore your image, including voice and utterances (“Image”) (e.g., when you make a speech or comment) may be recorded and used, with neither geographical nor temporal restriction, nor with restriction as to the medium and number of copies, to share information about the Event and for promotional purposes of GlobalLogic or for the purpose of internal communication in our company, depending on the function you perform within our organization.

Please note, that if you decide to participate in an Event as a speaker, your personal data, including an Image, might get published for indefinite period of time on the Internet, in a manner that may allow an unrestricted number of people to view it.

Where, for the above activities of GlobalLogic, the applicable law requires the consent of the person whose Image has been recorded, GlobalLogic will collect such proper consent from you.

The purpose of processing

In general, we process your personal data for needs related to employment (managing the employment relationship or other type of established cooperation), that is, primarily for the purpose of a start and an end of our relationship, organizing work and business trips, ensuring workplace safety and proper relations in the workplace, preventing and counteracting violations of internal policies and laws, payment of remuneration, enabling you to exercise particular rights and make use of benefits, immigration purposes, accounting, business and market development or other lawful reasons, statistical purposes, legal compliance, including with regard to tax settlements and social insurance regulations, and meeting other requirements imposed by internal regulations in connection with employment, especially in order to monitor and ensure information security (and avoid data leaks) and proper use of the work tools provided to you.

As we operate in an international environment, we may collect your residence, citizenship and nationality data for the following purposes:

- a) to verify that you hold a residence title entitling you to work in the territory in which we operate,
- b) to prevent the establishment and maintenance of relationships with individuals on sanction lists published by authorized national and international authorities,
- c) to ensure compliance with applicable legal regulations, in particular US export control regulations (due to the fact that our technologies and deliverables, as well as certain of the products, including software source code, and technologies that we receive from our customers and suppliers, are subject to US export control regulations, as a company group with its headquarters in the United States, we must ensure that our global business operations are conducted in full conformance with the regulations),
- d) to comply with the legal requirements for business reporting.

You may provide gender data to help us ensure diversity, equality, and inclusion (DEI) in our work environment. Analyzing this data helps us build diverse teams without discrimination, ensuring fair opportunities for all employees. Our goal is to create an inclusive work environment where every employee feels accepted, supported and free from any form of discrimination based on gender or any other characteristic. Furthermore, processing gender data is crucial in order to strengthen the principle of equal pay and transparency in compensation practices within our organization.

We will also process your personal data for purposes related to potential disputes between you and the controller.

GlobalLogic will hold your personal data confidential and will not disclose, sell, process, or use it for unlawful purposes.

We may use non-personally identifiable information to understand use of or improve GlobalLogic's internal platforms or applications and for other similar purposes. We may share non-personally identifiable information with others for information, business or any other purposes permitted by law.

Access

Access to your data is restricted to those who need it for the purposes outlined above, and generally they will only have access to that part of the data relating to you that is relevant to the particular purpose concerned.

Access will generally be restricted to those responsible for management and members of the human resources, employee services, payroll, benefits, finance, legal and IT departments.

Your work contact details (name, job title, email, phone and mobile) are shared throughout the Company as are any data that you share via GlobalLogic internal systems (such as GLO or Portal).

Your work contact details may also be shared with the GlobalLogic's parent companies for purposes of management and analysis, decision making, and other business purposes.

We will not sell personally identifiable information to third parties but we may share it with our agents, auditors, other professional advisors or consultants, and service providers who assist us in running our business and who are subject to security and confidentiality obligations. Whenever personal data is disclosed to a third party in this way, it will only be to the extent necessary to perform our contract with you or for the purposes of our legitimate interests.

Your data may be transmitted to entities that provide support for our ICT tools and systems (e.g. data retention), to our clients and contractors, in particular to companies providing access to benefits, training courses, organizing/ booking trips and accommodation, including within the framework of the above activities to companies in the GlobalLogic group.

In addition, we will disclose personally identifiable information when we believe that such disclosures are required by law, regulation, legal process or governmental request, protect your safety or security, as well as safety and security of databases or third parties and of tangible or intangible property that belongs to us or to third parties. Also, in the event that GlobalLogic, or its assets, are acquired, personally identifiable information may be one of the transferred assets.

GlobalLogic is a global company which means that some companies from the GlobalLogic group or our clients and partners are located outside the European Economic Area (EEA) or the United Kingdom and, therefore, personal data may be used in countries which may not have data protection regulations as stringent as those in Europe.

Retention period

In general, we process personal data only for so long as is necessary for the purpose(s) for which it was originally collected, unless you withdraw your consent earlier (where processing of your personal data is based on your consent) or object to some operations we perform (where legally allowed). We will normally keep your personnel file throughout the time that you work for us.

After that, as a rule, it will be deleted unless it is necessary for us to continue to process it for the purpose of compliance with legal obligations to which we are subject (e.g. relating to audits or tax) or for another legitimate and lawful purpose.

In particular, the above periods may be extended, if necessary, in the event of any claims and court proceedings – for the duration of these proceedings and their settlement.

Sometimes your data may be available in the mediums such as the Internet for indefinite period of time, and the group of recipients of your data is therefore unlimited (e.g., in some cases of dissemination of photo/video containing your Image).

Miscellaneous

GlobalLogic endeavors to protect your personal information. The Company uses both technical and organizational measures to maintain the integrity and security of our databases. Please be aware though that no security measures are perfect or impenetrable and GlobalLogic will only be responsible or liable for any damages, losses or causes to the extent provided by law.

All GlobalLogic policies/supplements are subject to local laws where the Company operates. In the event of any conflict between the provisions of this Privacy Notice and the law in the specific country, the local law shall govern.

Additional information for residents of Latin America and Mexico

In addition to this Privacy Notice you shall also read your local policy (privacy statement) linked below, if you are a resident of:

[Argentina](#)

[Chile](#)

[Mexico](#)

[Columbia](#)

[Peru](#)

[Uruguay](#)

Additional information for California residents

In addition to this Privacy Notice you shall also read the CCPA notice available [here](#).

Additional information for residents of the European Union ("EU"), European Economic Area ("EEA") or the United Kingdom ("UK")

As a rule, this chapter does not apply to processing of personal data that is outside of the scope of the GDPR / UK GDPR – when it is carried out by a GlobalLogic group company (as a data controller) that does not have its seat nor establishment within the EEA or the UK and does not concern data subjects who are in the EEA or the UK. In case of any doubts please contact us at privacy@globallogic.com.

The rules set out in this part of the Privacy Notice are applicable to activities involving the processing of personal data taking place on and after May 25, 2018. In relation to the UK after Brexit, the rules set out in this part of the Privacy Notice are applicable to activities involving the processing of personal data taking place on and after January 1, 2021.

In addition to this Privacy Notice you shall also read your local policy linked below, if you are a resident of:

[Croatia](#)

[Germany](#)

[Poland](#)

[Romania](#)

[Slovakia](#)

[Spain](#)

[Sweden](#)

[United Kingdom](#)

Legal basis of processing

The legal basis for the processing of your personal data is primarily:

- the contract that binds us (Art. 6(1)(b) GDPR/UK GDPR), and
- complying with legal obligation to which we are subject (Art. 6(1)(c) GDPR/UK GDPR).

In some very limited instances, the legal basis for the processing may also be your consent – if allowed (Article 6(1)(a) GDPR/UK GDPR), or the legitimate interest of the controller or a third party (e.g. improving the process of management and internal communication at GlobalLogic, promotional purposes, ensuring the integrity, security and compliance of GlobalLogic and its group companies and business partners with their regulatory requirements, in particular due to the fact that each GlobalLogic company must comply with the requirements applicable to the capital group as a whole) – Article 6(1)(f) GDPR/UK GDPR.

Your rights

For the effective exercise of your rights please send any requests to the e-mail address privacy@globallogic.com from the contact address you have provided to us, with subject “GDPR Request” (or “UK GDPR Request”), and specify which right(s) you wish to invoke. Please note that the instructions given in the preceding sentence are only a recommendation, not a requirement.

You have the following rights:

1. Access to your personal data – you may ask us at any time to provide detailed information regarding:
 - a. whether we are processing your personal data;
 - b. for what purpose;
 - c. what categories of data we are processing;
 - d. who is the recipient of your data;
 - e. what is the planned duration of processing (if possible), and if we are not able to say, the criteria for determining that duration;
 - f. if the personal data has not been given by you – all available information about the source of the data.

You can also receive access to all of your personal data that we are processing (data copy).

2. Data rectification – if information about you is or has become inaccurate or incomplete, you have the right to demand that data is rectified or made complete.
3. Withdrawal of consent – in those limited instances, where processing of your personal data is based on your consent, you can withdraw such consent at any time, without affecting the lawfulness of processing performed prior to such withdrawal.
4. Erasure of data – in certain situations, GDPR / UK GDPR gives you the “right to be forgotten.” You can invoke this right if we are still processing your personal data, particularly in the following cases:

- a. the data is no longer necessary for the purposes for which it was collected or otherwise processed;
 - b. you withdraw consent to the processing of personal data and there is no other legal basis for continuing to process it;
 - c. you object to the processing of your personal data when there are no overriding, justified legal bases for processing;
 - d. you object to the processing of your personal data for marketing purposes;
 - e. your data is processed in a manner that violates the law;
 - f. the law requires that we erase your data.
5. Restriction of processing – you can demand that we limit our activities in principle only to storing information about you when:
- a. you question the correctness of personal data we are processing – for a period of time that allows us to determine the correctness of that data;
 - b. the processing of your personal data violates the law, but you prefer that processing be restricted rather than the data be erased;
 - c. GlobalLogic no longer needs your personal data for the purposes of processing, but you need it for establishing, pursuing, or defending legal claims;
 - d. you have objected to the processing of your personal data – only until such time as it is determined whether your interests take precedence over our legitimate interests.
6. Data portability – you have the right to receive your data in a commonly-used format that can be read by a computer, and also to have your data sent to another data controller, if:
- a. processing is done on the basis of your consent or a contract; and
 - b. processing is done in an automated manner.
7. Objection – you have the right to object to some operations we perform on your personal data for special reasons related to your personal situation, particularly in the following cases:
- a. when our processing is based on legitimate interest, including profiling based on this legal basis;
 - b. when we process your personal data for purposes related to scientific or historical studies, or for statistical purposes.

Remember, however, that when in spite of your objection we conclude that there are important, legally justified grounds for processing that override your interests, rights and freedoms, or the basis for establishing, pursuing or defending claims, we will continue to process your personal data encompassed by the objection to the extent necessary. If you disagree with such an assessment of the situation, you can exercise your right to file a complaint with the relevant public authority (more information below).

8. Complaints to the relevant public authority – in connection with our actions as the controller of your personal data, you have the right to file a complaint to the relevant data protection authority. You can find a list of local authorities responsible for data protection across the EU and their contact details at: https://edpb.europa.eu/about-edpb/board/members_en. In the UK, data the protection authority is Information Commissioner’s Office, for more information go to: <https://ico.org.uk/make-a-complaint/>.

Third countries

GlobalLogic operates internationally and, therefore, personal data may be used in countries outside of the EU/EEA, which may not have data protection regulations as stringent as those in Europe. The Company will transfer such information to third countries in accordance with the applicable privacy laws, in particular GDPR, in particular to each country in which GlobalLogic conducts business, or has a service provider, for the purposes set out in this document and the local policy that applies to you.

Transfer of personal data to a third country or an international organisation may also take place where the European Commission has decided that a third country, a territory or one or more specified sectors within a third country, or an international organisation ensures an adequate level of protection of personal data (transfer on the basis of an adequacy decision).

GlobalLogic applies all required safeguards, including standard data protection clauses adopted pursuant to decisions of the European Commission. You can obtain a copy of the security measures we apply for the transfer of personal data to third countries by contacting us at privacy@globallogic.com.

Updates of this Privacy Notice

This Privacy Notice shall be reviewed once a year and updated where necessary – especially in case of changes of applicable laws, new data protection authorities’ guidelines or decisions, and best practice.

Change History

Revision	Change Description	Valid Date	Approver
1.0	Initial release	April 26, 2018	Ana Absi, Global Privacy Counsel
2.0	The document was renamed (from “Privacy and Personal Data Protection Policy” to “Internal Privacy Notice”), reorganized and divided into sections. Additional information for residents of the EU or EEA (along with local Croatian, German, Polish and Slovak policies) and for residents of Argentina was added.	December 6, 2019	Kamila Koszewicz, Global Privacy Counsel
3.0	Annual review. References to Privacy Shield removed. CCPA definition added, personal data definition updated to cover personal information. Local notices for Sweden and for California residents were added.	September 1, 2020	Kamila Koszewicz, Global Privacy Counsel

4.0	Complex updates to account for Brexit. Privacy notice for UK and information about background checks added.	February 5, 2021	Kamila Koszewicz, Global Privacy Counsel
4.1	Privacy notice for Chile added.	May 13, 2021	Kamila Koszewicz, Global Privacy Counsel
4.2	Annual review. Links to local privacy policies fixed. List of personal data processed updated.	May 31, 2022	Kamila Koszewicz-Grzeszczak, Global Privacy Counsel
4.3	Added information on sharing data with GlobalLogic's parent companies.	September 2, 2022	Kamila Koszewicz-Grzeszczak, Global Privacy Counsel
5.0	Annual review. Updated sections "Description – what data do we process" and "The purpose of processing". Added Privacy Notice for Mexico, Romania and Spain	July 12, 2023	Kamila Koszewicz-Grzeszczak, Global Privacy Counsel
6.0	Privacy notice for Columbia, Peru and Uruguay added.	Mar 1, 2024	Kamila Koszewicz-Grzeszczak, Global Privacy Counsel
7.0	Added information on collecting gender data.	April 19, 2024	Kamila Koszewicz-Grzeszczak, Global Privacy Counsel
8.0	Added information on collecting nationality, citizenship and residency	May 10, 2024	Kamila Koszewicz-Grzeszczak, Global Privacy Counsel
9.0	Annual review	December 16, 2024	Kamila Koszewicz-Grzeszczak, VP Global Compliance & EMEA Legal