

# Privacy Notice – UK

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If you are a member of our team, regardless of the legal basis of our cooperation, we process your personal data. We treat all information concerning you responsibly and in accordance with the law – in particular with the UK GDPR as well as applicable local laws.

This Privacy Policy presents detailed information about who we are in light of the abovementioned regulations, and what obligations we have in respect of your personal data, its scope, and the purpose and duration of processing. If anything in this Policy seems unclear or gives rise to doubts, please contact us at [privacy@globallogic.com](mailto:privacy@globallogic.com).

The rules set out in this Privacy Policy are applicable to activities involving the processing of personal data based on the GDPR taking place on and after May 25, 2018 and based on the UK GDPR taking place on and after 1 January 2021.

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### I. Glossary – basic concepts.

Controller – depending on which company you concluded a contract with respectively:

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Personal data – all information that we process related to you. For example: first name, last name, e-mail address, telephone number, information about your professional experience, etc.

“Sensitive” personal data – special categories of personal data, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

Processing – all operations that we perform on your personal data. This includes collecting, retaining, updating, sending correspondence to you, and erasure of data.

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.

## II. What personal data do we process?

The scope of personal data that we process depends on the legal basis of our cooperation – employment contract or another common law contract – and also the information you supplied in conjunction with recruitment, conclusion of a contract and during the period it is in effect. This encompasses primarily the content of documents, as well as of any potential communication between you and us.

In the event the legal basis for our cooperation is the fulfilment of your **employment contract**, we primarily process personal data and “sensitive” personal data collected during the stage of recruitment and employment. This may include, but is not limited to:

- a. first name and last name,
- b. date and place of birth,
- c. photo ID,
- d. sex,
- e. citizenship and nationality,
- f. contact data, including email address provided to us,
- g. information about your education,
- h. your professional qualifications (including licenses, certificates and professional qualifications for performance of certain jobs),
- i. occupation,
- j. your employment history,
- k. place of residence and home address,
- l. data about the residence and work permit or work registration certificate,
- m. passport or other necessary means of identification,
- n. your social security (national insurance) number,
- o. tax number,
- p. other personal data, including personal data of your children and other members of your closest family – to the extent such data is necessary in conjunction with your employment,
- q. bank account number, if you have not filed a request for payment of the remuneration in cash/directly,
- r. contract term (limited or unlimited term),
- s. employment with another employer / additional work or non-full time work,
- t. data on contractual non-competition with former employer or Controller,
- u. date of termination of employment relationship,
- v. reason for termination of employment relationship,
- w. term of trial period (if contracted),
- x. allocated work resources (official vehicle, mobile phone, laptop),
- y. data related to Controller’s IT equipment and systems, in certain cases also the way you use them and the content you have prepared, including content sent in business emails,
- z. data regarding violations of our policies or laws, if we receive appropriate notice and data collected during investigations,
- aa. information we collect (directly or through a service provider/governmental authority, public entity, including from publicly available sources) when conducting background checks upon the request of a client to check your suitability for a certain position, including your identity, education or employment history, information on global

- sanctions and enforcement, presence on “watch lists” maintained by government or international agencies, criminal records etc., within the scope legally allowed,
- bb. criminal records, if it is required for persons holding particular positions,
- cc. health-related data (including COVID-19 vaccination status, COVID-19 test results, having recovered from COVID-19, as well as current symptoms), where legally allowed,
- dd. other data required for exercise of rights and obligations provided under the law.

In general, we may also process your other personal data, if they are necessary for exercising specific rights or for compliance with a legal obligation, you have given your consent or we have a legitimate interest in doing so.

In addition, the scope of personal data processed by us, includes information arising from your employment contract, such as position or role, remuneration, place of work, time of work, the date of employment commencement, as well as resulting from the course of employment, concerning *inter alia* dates and duration of holiday leave, maternity leave, parental leave, sick leave, accidents at work, additional benefits or assessment of your work and performance.

We may also request, collect and process information about your education, professional qualifications and certifications from public sources and/or third parties, including schools, universities, your former employers or other persons, in particular to assess or confirm the accuracy and authenticity of data you provided.

If the basis of our cooperation is a contract other than an employment contract, for example a consultancy contract, for a specific work or for the provision of B2B services, in principle, the scope of data we collect is in practice analogous to the above, modified appropriately depending on the nature of the relationship of cooperation and the parties' obligations envisaged therein (in each case, however, we only collect such data as is necessary to properly execute and settle the contract).

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 Controller. 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 declining granting certain benefits to you.

In every case when the basis for processing your personal data by GlobalLogic is or may be your consent, **the lack or withdrawal of your consent will not result in any unfavourable treatment, nor in any negative consequences for you.** In particular, it will not constitute a basis for declining your employment or termination of the contract with you, with or without proper notice by GlobalLogic.

### III. What is the purpose / legal basis of processing of personal data?

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 organising work and business trips, ensuring occupational health and safety, payment of remuneration, enabling you to exercise particular rights and benefits, legal compliance, including with regard to tax matters and financial sector regulations, and meeting other requirements imposed by internal regulations in connection with employment.

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

- a. the contract that binds us (Art. 6(1)(b) UK GDPR); and
- b. complying with legal obligation to which we are subject (Art. 6(1)(c) UK GDPR) – with regard to personal data whose collection and storage is required by generally applicable provisions of law, for example tax, accounting, in respect of retaining employment records or payment of social, health and pension insurance contributions

(unless the basis of our cooperation is a contract other than an employment contract), tax matters.

Sometimes, we may process your personal data which has not been included in the catalogue above, for example your photograph or image (please see also point IV below), if you voluntarily disclose the data to us and if it is related to and takes part during our cooperation. The legal basis for the processing in such cases may be your **consent** (Article 6(1)(a) UK GDPR, and in case of “sensitive” personal data – Art. 9(2)(b) UK GDPR), or the **legitimate interest of the controller** (e.g. improving the process of management and internal communication at GlobalLogic) – Article 6(1)(f) UK GDPR.

Your consent may be the basis for processing your personal data made available by you at the request of GlobalLogic or provided by you at your own initiative. In case of “sensitive” personal data the consent may refer only to the situations when you provide such data at your own initiative.

You can revoke your consents at any time - it will not affect the legality of processing performed prior to such revocation. You may revoke your consent for processing of personal data by contacting us at: [privacy@globallogic.com](mailto:privacy@globallogic.com) or in another appropriate manner, depending on the mechanism used to give your consent in each particular case.

We will also process your personal data for purposes related to potential disputes between you and the Controller, to conduct investigations in order to detect, prevent and cease violations of the law or our internal policies, for statistical purposes, in order to ensure workplace safety, including the protection of persons and property, workplace access control or production control or keeping confidential information which could expose GlobalLogic to damage if revealed, *inter alia* by the use of video monitoring on the premises of the workplace, , or in order to prevent information leaks and ensure proper use of work tools made available to you, e.g. by using monitoring of these devices or email, for legally permissible purposes related to the "background check" procedure, or for the Controller's marketing purposes (e.g. to send a Christmas greeting card) or for assessing and confirming to accuracy and authenticity of data you provided in connection with the employment. The legal basis for their processing in such cases is the **legitimate interest of the controller** (Article 6(1)(f) UK GDPR, in the case of "sensitive data" - Article 9(2)(f) UK GDPR) - unless we act on the basis of a legal provision.

This legal basis allows also processing biometric data, e.g. fingerprints (when it is necessary to control access to vital information which could expose GlobalLogic to damage if revealed, or access to strictly protected premises).

#### IV. Your image

Occasionally, GlobalLogic may organise or suggest you attend and interesting event, e.g. conference, fairs, lecture or marketing project (“Event”), which you may voluntarily attend e.g. as a listener, participant, speaker or in a different character (e.g. as a host).

Sometimes also your role in our organisation / the nature of your work consists in actively representing GlobalLogic outside the organisation in various types of Events.

As GlobalLogic (or with a help of third party acting on our behalf) as a rule, we record the Events in video recordings or photographs, therefore your image, including voice and utterances (“Image”) (e.g. when you make a speech, sit in the audience, stand on our stage, receive a prize, congratulate the winners etc.) may be recorded and used, with neither geographical nor temporal restriction nor with restriction as to the medium and number of copies, to inform about the course of the Event and for promotional purposes of GlobalLogic, also including for purposes of improving the management process and internal communication in GlobalLogic, depending on the function you perform within our organisation.

Please remember – if you attend our Events or the nature of your work consists in actively representing GlobalLogic, you agree with the fact that your Image may be recorded and disseminated.

The use and dissemination of the Image will consist, without limitations, of its publication in the original form or in processed form (i.e. edited), including on the website of GlobalLogic, entities from GlobalLogic group, GlobalLogic's partners, on the intranet, and also in social media, sending via e-mail, on Facebook, YouTube, Vimeo, LinkedIn, etc., newsletter, and also in public speeches, conferences, and fairs, in a way allowing it to be seen by a group of people not specified in advance.

It includes multiplication of the Image with the use of any currently available techniques and methods, and on any image and sound storage devices, including saving in computer memory and IT networks and selling, lending or leasing copies of recorded material.

The Image may be used in various types of electronic image processing, framing and composition, and combined with images of other people – without the obligation to accept final product, however, not in a form that may be offensive or is generally deemed to be unethical.

GlobalLogic may mark the Image with textual and/or graphical description, and alternatively your name and surname, at the discretion of GlobalLogic, for the purpose of development of positive image of GlobalLogic and for information purposes.

Your Image is your personal data to us. We will process it as the data controller, in compliance with this Privacy Policy, the rules determined by applicable laws and regulations in relation to publication of photo or video containing your Image – for information purposes and the purposes of GlobalLogic promotion among current and potential employees, associates and business partners.

Depending on specific needs and circumstances, your Image may also be recorded in order to include it on ID badges used in our organisation in order to improve the management process and internal communication in GlobalLogic.

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. Any consent is given voluntarily and may be revoked at any time, unless applicable law provides otherwise.

Legal basis for our actions, apart from any potential consents, are our legitimate interests (Art. 6(1)(f) UK GDPR). i.e. the use of legally obtained image, for the purposes of promotion of GlobalLogic brand, development of positive image of GlobalLogic, information on our activities, improving the management process and internal communication in GlobalLogic.

We will process your Image generally until the conclusion of our cooperation, the objection to processing or until possible withdrawal of the consent, however, due to the planned dissemination of photo/video, your Image may be available in the mediums such as the Internet for indefinite period of time, and the group of recipients of your Image is therefore unlimited.

## **V. For what period is your personal data retained?**

In principle, we will process specified categories of your data for the period of:

- a. employment,
- b. until consent is withdrawn or the purpose for which it has been expressed has been achieved (within the scope of processing performed on the basis of your consent),

c. objection is properly submitted (in the case of data for which the basis of processing is a legitimate interest); however, data from monitoring will be deleted after a maximum of 3 months after recording/collecting, unless provisions of law oblige us to process this data for a longer period of time (in particular for archiving documents), or we retain it longer in case of potential claims during the limitation period defined by law, in particular the Limitation Act 1980, prolonged by no more than one year for operational reasons (in each case as allowed by the law and the longer proper processing period shall be applied). We process your personal data for the duration of the contract and usually for a period of about 7 years from its termination considering potential claims related to our contractual relationship.

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. In particular, in case the video recordings are evidence in proceeding conducted on the basis of law or if GlobalLogic is notified that the recordings may constitute evidence in such proceeding, the processing period extends until the legally valid conclusion of the proceeding.

## **VI. Who has access to your personal data?**

Your personal data will only be accessed by duly authorised GlobalLogic employees or associates, advisers (including those providing current legal services) or auditors – to the extent necessary to perform their duties.

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

GlobalLogic may also be required - if there is a legal basis to do so - to provide certain information to public authorities for the purposes of their investigations.

We are a global company, which means that some companies from the GlobalLogic group and our associates are located outside the UK. In all cases the transfers of personal data outside the UK are permitted under Article 46 of the UK GDPR and we apply all required safeguards, including standard data protection clauses adopted pursuant to the UK GDPR. Where it is necessary, we also endeavour to ensure that our partners are covered by appropriate safeguards. Additionally, in order to protect personal data, both when sending and receiving it, we apply generally accepted standards. 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](mailto:privacy@globallogic.com).

## **VII. What rights do you have related to the processing of your personal data?**

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 – you can withdraw your consent to the processing of your personal data at any time (if it was given), without affecting the lawfulness of processing performed prior to such withdrawal.
4. Erasure of data – in certain situations, 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 vital for the purposes for which it was collected or otherwise processed;
  - b. you revoke 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;
  - 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.  
 In the UK, this is the Information Commissioner's Office. A detailed explanation of the procedure for submitting a complaint is available at: <https://ico.org.uk/make-a-complaint/>

To ensure the exercise of your rights, please send each request via e-mail to: [privacy@globallogic.com](mailto:privacy@globallogic.com), with the subject "GDPR request", and in the body of the message specify which rights you wish to exercise (this will accelerate the process, but you may submit your request in another form, including in writing).

## Change History

Revision	Change Description	Valid Date	Approver
1.0	Initial release	February 5, 2021	Kamila Koszewicz, Global Privacy Counsel
1.1	Annual review Update of the list of processed personal data, the purpose of processing, and the retention period	May 31, 2022	Kamila Koszewicz-Grzeszczak, Global Privacy Counsel
2.0	Annual review Update of the list of processed personal data and the purpose/legal basis for processing.	July 27, 2023	Kamila Koszewicz-Grzeszczak, VP Global Compliance & EMEA Legal
2.1	Annual review Update of the list of companies that may act as data controller Review in terms of compliance with laws of Northern Ireland	December, 9, 2024	Kamila Koszewicz-Grzeszczak, VP Global Compliance & EMEA Legal