TCS Candidate Privacy Notice -France

WHAT IS THE PURPOSE OF THIS DOCUMENT?

Tata Consultancy Services Limited S.A. located at Tour Initiale – 1 terrasse Bellini – PUTEAUX – 92919 – PARIS La Défense CEDEX ("TCS" or "we") is committed to protecting the privacy and security of your Personal Data.

This privacy notice ("Notice") applies to all job applicants who decided to share their Personal Data with TCS ("Candidate") and describes how we process Personal Data about you during and after the recruiting process in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR").

As regards your Personal Data processed by TCS, TCS is a "Data Controller". This means that we are responsible for protecting your Personal Data in accordance with our processing. As is required under applicable data protection laws, with this Notice we hereby notify you of the following information regarding TCS' processing of your Personal Data. We consider "processing" to be any operation or set of operations which is performed on Personal Data, whether by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, vital disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

It is important that you read this Notice, together with any other privacy notice we will provide on specific occasions when we are processing Personal Data about you; so that you are aware of your rights associated with that processing and reasons why we are processing your Personal Data.

DATA PROTECTION PRINCIPLES

TCS is committed to protecting your Personal Data in line with all applicable data protection laws, including:

1. Using your Personal Data lawfully, fairly and in a transparent way.

2. Using your Personal Data only for valid purposes which are based on solid legal ground which we will clearly explain to you.

3. Use that is relevant and limited to the purposes we have told you about and not for other purposes incompatible with those original purposes.

4. Your Personal Data should be accurate and up to date.

5. Your Personal Data shall be kept only as long as necessary to fulfill the legitimate purposes we have told you about.

6. Your Personal Data shall be kept securely.

7. Take responsibility for what we do with Personal Data and how we comply with the other principles and to have appropriate security measures in place to protect the Personal Data we hold.

THE KIND OF PERSONAL DATA WE HOLD ABOUT YOU

Personal data means any information about you that identify you or can be used to identify you ("Personal Data"). Examples of Personal Data are listed below. Personal Data does not include data where the identifying characteristics have been removed ("Anonymized Data"). Anonymized Data is not treated as Personal Data and is not protected by data protection laws.

In addition to Personal Data, there are special categories of more sensitive Personal Data which require a higher level of protection ("Special Categories"). Under the GDPR Special Categories of Personal Data include racial/ethnic origin, political opinions, religious/philosophical beliefs, trade union membership, processing of genetic/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.

Personal Data used by TCS include the following:

1. Identifying and contact details: Your full name, address and contact details, including personal email address and telephone number;
2. Recruitment related data: Date of birth, nationality, citizenship, residency, gender, social security number, visa and work permit details, any form of officially accepted identity card;
3. Details of your education, qualifications, language and professional skills, experience and employment history; details about your current and previous job position (including organization and previous employer references), grade, notice period, professional membership, community engagement, certifications;
4. Information about your expected remuneration, including benefit entitlements; your employment preferences (such as geographic location, willingness to relocate)
5. Additional information to facilitate onboarding: Financial information like bank name and account number, tax number;
6. Different media including: photos, CCTV recordings;
7. Records created as part of evaluation generated by interviewers and recruiters, information provided by third-party recruiters, references provided by others;
8. Your feedback and comments about the recruitment process;
9. Any other information you voluntarily provide during application process in your CV, cover letters or other correspondence with us.
10. Data collected during your physical visit during job interview for visitor access like date and hour of accessing/departing the office, your signature

11. Information about your health, including any medical condition, health and sickness records only where necessary for the specific job position and allowed by the law;
12. Information related to background screening (if applicable) which depends on situation may include Personal Data like identification data, right to work, employment history, references from previous employers, education history, sanction checks, authenticity of criminal records, media exposure media/reputation), company mandates (e.g., director/shareholder positions) - only when this is required for the specific job position and allowed by the law.

HOW IS YOUR PERSONAL DATA COLLECTED?

We collect Personal Data in a variety of ways both directly and indirectly. We receive Personal Data directly from you, when you: apply on one of our career websites, send your application via email directly to TCS, share your resume with us or participate during a job fair or similar event. In some cases TCS will also collect your Personal Data from third parties, when you apply for a position on a job portal or through a social network (e.g. LinkedIn), when you are referred by someone else for a specific job position (e.g. Bring your Buddy referral program), when your Personal Data is shared with TCS by external recruitment agencies, our customers or if applicable - from background check companies.

GROUNDS FOR USING PERSONAL DATA

We will only process your Personal Data when we have lawful basis to do so. As such, we will most commonly process your Personal Data when based on the following legal basis:

1. **Performance of a Contract** - where processing is objectively necessary to take pre-contractual steps with you, once we decide to hire you and before you become an employee.

2. **Legal Obligation** - where TCS is required or permitted to process certain Personal Data for compliance with a legal obligation to which TCS is a subject.

3. **Legitimate Interest** – where the processing is necessary to fulfill a legitimate interest of TCS (or those of a third party); only where your interests and fundamental rights do not override legitimate interests of TCS.

4. **Consent** - in limited circumstances where we would like to process your Personal Data, we can ask for your consent.

There may be several grounds which justify our use of your Personal Data within one processing activity. However, each particular Personal Data will be processed on the basis of only one accurate legal ground.

HOW WILL WE PROCESS PERSONAL DATA?

Below you can find general purposes for which we process your Personal Data, but please bear in mind that not all cases described below may be applicable to you as each case should be treated separately. We have connected the purposes together with applicable general categories of Personal Data, legal basis and external and internal recipients of the Personal Data (external recipients may change from time to time – for any questions regarding recipients of your data, please contact our DPO at: DPO.Europe@tcs.com).

Purposes for processing	**Data categories (*as defined in section "The kind of personal data we hold about you"***	**Legal base**	**Recipients of the Personal Data**
Assessing your suitability for a particular job or task; To determine your eligibility for recruitment or appointment;	(1), (2), (3), (4) ,(6), (7), (9),(11),(12)	Legitimate interest, Special category data, on the base of Article 9(2)(b)	HR and Project Management team within TCS, Client
Facilitating communciation with you	(1)	Legitimate interest	HR Team within TCS, Project Management team within TCS
Perform pre-employment background checks if applicable; where allowed by local legislation, to check identification data, employment history, references from previous employers, education history, right to work, sanction checks, authenticity of criminal records, media exposure media/reputation), company mandates (e.g., director/shareholder positions) and your background is compatible with the job opportunity;	(1), (2), (3), (12)	Legitimate Interest, legal obligation	HR Team within TCS, Project Management team within TCS, Background checks vendor
Getting ready the employment contract we will enter into with you; assist with your visa application, work permit	(1), (2), (3), (4) ,(5), (6),(7), (9),(11), (12)	Performance of Contract, Legal	HR team within TCS, project Management Team, external or internal expat assistance vendors, Local Government

renewal, tax and social security applications.		Obligation, Special category data, on the base of Article 9(2)(b)	Authority, Admin and Finance team within TCS, external payroll vendors, IT and ISM Teams within TCS
Perform data analytics, improve our recruitment process	(1), (7), (8)	Legitimate interest	HR team within TCS, project Management Team
To comply with legal obligation for providing information to a public authority or law enforcement agency, as applicable	(1), (2), (3)	Legal obligation	Labour or governmental authorities and other regulatory bodies
CCTV monitoring	(6)	Legitimate interest	Admin team within TCS, External vendors
Visitor access control	(1), (10)	Legitimate interest	Admin team within TCS, External vendors
Maintaining your details in our database to contact you if we have any new opportunities, unless you request to remove your details	(9)	Consent	

Change of purpose

We will only use Personal Data for the purposes for which we collected it, unless we reasonably consider that the Personal Data is required for another reason and that reason is compatible with the original purpose for processing. If we need to process Personal Data for a purpose unrelated to the original purpose of collection, we will collect Personal Data separately once more for the new purpose or we will notify you and we will explain the context and legal basis which allows us to process Personal Data we have (if applicable).

HOW WE PROCESS SPECIAL CATEGORIES OF PERSONAL DATA?

Special Categories of Personal Data require higher levels of protection. We need to have additional legal ground for processing this type of Personal Data. We may process Special Categories of Personal Data in the following circumstances:

1. With your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in relation to the recruitment procedure.
3. Less commonly, we may process this type of Personal Data where it is needed in relation to legal claims or where it is needed to protect your vital interests (or someone else's

interests) and you are not capable of giving your consent, or where you have already made the Special Categories of Personal Data public.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We may only use information relating to criminal convictions as part of the recruitment process if it is applicable given the nature of the role (e.g. when you will work for a regulated industry) and where we are legally able to do so. This will usually be where such processing is necessary to carry out our obligations and is done in line with our background checks process if applicable. Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

PERSONAL DATA SHARING

We may have to share your Personal Data with third-party service providers (e.g. recruitment partners, background check if applicable and payroll vendors, IT providers, other contractors or agents that may assist us in recruitment, evaluating and pre-employment screening and testing, and improving our recruiting practices), clients and other entities in the TCS group ("Third-Parties"). If TCS shares your Personal Data with Third-Parties, we will only do so where those Third-Parties have appropriate security measures in place to protect your Personal Data and who process your Personal Data in accordance with applicable data protection law. For more specific information about Third-Parties that receive Personal Data, please write to our DPO at DPO.Europe@tcs.com.

Why might you share your Personal Data with Third-Parties?

We will share your Personal Data with Third-Parties where required by law, where it is necessary for the recruitment process or where we have another legitimate interest in doing so.

How secure is your Personal Data with Third-Parties?

Whenever TCS is Data Controller and Third-Parties process your Personal Data on our behalf, they are required to implement appropriate security measures to protect your Personal Data in line with our security policies. We only permit Third-Parties to process your Personal Data in line with our instructions, and we do not allow Third-Parties to process your Personal Data for their own purposes.

When might you share your Personal Data with other entities in the group?

We will share your Personal Data with other entities in TCS group according to the necessity for the recruitment purposes; for example, the interview panel may be composed of associates of

another entity than the one recruiting you. Also, Personal Data will be shared for regular reporting, monitoring and in the context of a business reorganization or group restructuring exercise, for system maintenance support and hosting of data.

What about other third parties?

TCS will share your Personal Data with other third parties such as regulatory/governmental authorities or courts when required to do so by law. Any such request will be assessed for its validity and legality prior to the transfer of any Personal Data.

Transferring Personal Data outside the EU/EEA

Depending on your scope of recruitment situation such as: projects you are applying, the structure and origin of corporate functions you are interacting with and also due to the international nature of our company, global processes managed and performed from different countries, applications processing Personal Data available from different countries and international teams located around the world, we may transfer the Personal Data we process about you to the countries outside the EU/EEA, where TCS's offices are located. Such transfers will always be secured by appropriate security measures.

As such, to ensure that your Personal Data does receive an adequate level of protection when transferred to non-adequate countries, we have put in place data transfer agreements based on Standard Contractual Clauses (SCC) – Module 1 (Controller to Controller) and Module 2 (Controller to Processor) together with Data Transfer Impact Assessments (TIAs) Standard Contractual Clauses (SCC) are an agreement between TCS and any Third-Party from the non-adequate country to which we transfer your Personal Data which require those Third-Parties to treat your Personal Data in a way that is consistent with EU/EEA laws on data protection. This includes implementing adequate physical and organizational security measures to protect your Personal Data. Transfer Impact Assessments (TIAs) are documents for assessment of the level of Personal Data protection in the non-adequate countries of destination and the need to put in place additional safeguards. TCS will not transfer your data to non-adequate countries without having the Standard Contractual Clauses (SCC) and Transfer Impact Assessment (TIA) in place to protect it. For a copy of the SCCs covering the transfer of your Personal Data please contact our DPO at: DPO.Europe@tcs.com.

Also, for the reasons listed above, we may transfer the Personal Data we process about you to the countries outside the EU/EEA where TCS's offices are located, which are deemed by the European Commission to be "adequate" and don't need additional Personal Data transfers mechanisms for legal transfer.

DATA SECURITY

TCS has put in place appropriate technical and organizational security measures to protect your Personal Data from accidental loss, unauthorized use or access and wrongful alteration or disclosure. In addition, we limit access to your Personal Data to those employees and other verified Third-Parties who have been authorized by TCS to process your data upon our instructions and for justified purposes only, subject to a duty of confidentiality. Details of these measures can be provided by contacting our DPO at: DPO.Europe@tcs.com.

Additionally, TCS has put in place procedures to promptly and effectively handle any actual or suspected data security breach and will notify you and any applicable authority of a suspected breach where we are legally required to do so.

Whenever TCS is the sole Data Controller, Third-Parties will only process your Personal Data on our instructions and where they have agreed to treat the information confidentially and to keep it secure in accordance with TCS' standards of security.

DATA RETENTION

TCS determines the retention period of your Personal Data based on the following retention criteria:

- We will retain your Personal Data as long as we have an ongoing relationship with you or when you have requested us to do so, and we consider your profile still suitable for other job positions. To determine the appropriate retention period in this case, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements;
- We may retain your Personal Data where it is required to do so by a legal obligation to which it is subject;
- We will retain your Personal Data where this is advisable to safeguard against legal claims (for instance in relation to statutes of limitations, litigation, or regulatory investigations).

In some circumstances, we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use such data without further notice to you.

In the event of a positive outcome of the recruiting process, your Personal Data will become part of your personal records and securely stored and processed according to our Privacy Policy and TCS Employee Privacy Notice, which will be provided to you when you commence your employment with TCS.

In case of an unsuccessful outcome of the recruiting process or if you reject the TCS offer, we will retain your Personal Data for a reasonable period from the end of the recruiting process and will then destroy it unless you specifically request us to retain it for a longer period. However, if you wish to have your Personal Data removed, you can exercise your rights as per section below. For more information regarding the retention period for any of your Personal Data processed by TCS, please contact our DPO at: DPO.Europe@tcs.com.

DATA SUBJECT RIGHTS

Your duty to inform us about changes

It is important that the Personal Data we hold about you is accurate. Please keep us informed if your Personal Data changes during your relationship with us.

Your rights in connection with Personal Data

By law, under certain circumstances, you have the right to:

- **Request access** to your Personal Data (commonly known as a "data subject access request"). This enables you to get knowledge if we process your Personal Data, for what purposes we process your Personal Data, and you can request to receive a copy of the Personal Data we hold about you.
- **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate Personal Data we hold about you corrected.
- **Request erasure** of your Personal Data. This enables you to ask us to delete Personal Data processed by TCS which you no longer wish TCS to process. This right is not absolute and can only be exercised in accordance with applicable laws.
- **Object to processing** your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your Personal Data in a commonly used electronic format to yourself or to another third party, where it is technically feasible and where the lawful basis for processing is consent or performance of contract

If you want to exercise a data subject right, please contact our Data Protection Officer or the HR person you've been in contact with.

What we may need from you to comply with your request to exercise your right(s)?

We will need to ask for specific information from you to help us confirm your identity and process with your request. This is another appropriate security measure to ensure that Personal Data is not disclosed to unauthorized recipients

RIGHT TO WITHDRAW CONSENT

When you have provided your consent for the processing of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact our Data Protection Officer as outlined below or the contact person who has been identified in the respective notice through which you consented. Once we receive notification that you have withdrawn your consent, we will no longer process your Personal Data for the purpose(s) you originally agreed to. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

DATA PROTECTION SUPERVISORY AUTHORITY

You have the right to make a complaint at any time to the applicable data protection supervisory authority. Your relevant data protection authority is: La Commission nationale de l'informatique et des libertés (CNIL), 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07 (https://www.cnil.fr/fr/saisir-la-cnil/contacter-la-cnil-standard-et-permanences-telephoniques)

DATA PROTECTION OFFICER

We have appointed a Data Protection Officer ("DPO") to oversee the compliance of TCS with applicable data protection laws and with this Notice. If you have any questions about this Notice or about how TCS processes or protects your Personal Data, please contact our DPO:

- Data subjects located in the European Economic Area (except Ireland): DPO.Europe@tcs.com

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this Notice at any time, and we will maintain an updated version at the webpage:

https://ibegin.tcsapps.com/candidate/privacy-notice?geography=FR&language=EN

In case of technical problems with the above website, we send this notice as an attachment letter to your email.