

Privacy Notice for Teleperformance Employees in the Philippines

We at Teleperformance are committed to respecting your privacy and the protection of your personal data. Teleperformance needs to use your personal data to ensure that we can meet all the requirements of the employment relationship you have with us. We also need to ensure we comply with laws and regulations, can respond to requests from supervisory authorities, handle legal claims, detect and prevent fraud, and carry out our business activities. Our Privacy Notice is provided to inform you of how Teleperformance processes your personal data and we regularly review it to ensure that it is up to date. **Please read it carefully.**

Key Sections of Our Privacy Notice

| | |
|---|---|
| Our Binding Corporate Rules & safeguarding your personal data | 2 |
| Fair, lawful and transparent processing | 2 |
| How we process your personal data | 3 |
| Sharing your personal data..... | 5 |
| Storing your personal data for no longer than is required | 5 |
| Exercising your rights..... | 6 |
| Contact details & links: | 7 |

Our Binding Corporate Rules & safeguarding your personal data

Teleperformance is proud to be one of a small number of global companies that has received approval for its Binding Corporate Rules from the Data Protection Authorities of the European Union (EU) under the GDPR (EU General Data Protection Regulation). Our Binding Corporate Rules are Teleperformance Group's global privacy framework. Our obtaining this approval reflects the importance we attach to protecting your personal data by adopting appropriate technical and organizational security measures and by the proper review of the processing we do. Approval of these Binding Corporate Rules enables us to transfer personal data within the Teleperformance Group globally in a manner that we consider provides appropriate safeguards and assurance.

As a global group we need to share several processes to ensure that we are efficient and effective. Consequently, we transfer some personal data to countries, territories, or organizations that are located outside the European Economic Area. In the event of transfers to territories not recognized as ensuring an adequate level of protection by the European Commission, we rely upon our Binding Corporate Rules where appropriate and use the standard data protection clauses adopted by the European Commission or other transfer mechanisms approved under the EU General Data Protection Regulation otherwise.

Teleperformance has appointed a DPO (Data Protection Officer) under both the GDPR and The Data Privacy Act of 2012 and this DPO is supported by the Global Privacy and Compliance Office to oversee our privacy framework. For further information about our privacy framework including details of our Binding Corporate Rules and about those countries within the TP group to which we transfer personal information please see the Privacy Policy at www.teleperformance.com.

Fair, lawful and transparent processing

Teleperformance collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, to you as an employee or a device associated with you ("personal data").

We may also collect certain demographic data that qualifies as sensitive personal data, such as race, ethnicity, sexual orientation, disability, health, and biometric data for the purpose of uniquely identifying a natural person when local law requires or allows. For instance, Teleperformance may need to process health data for the assessment of working capacity and sensitive personal data may be relevant when supporting employees with personal or employment relations issues, (such as addressing a discrimination concern).

Teleperformance is committed to diversity, equality and inclusion. Teleperformance has been a signatory of the United Nations' Global Compact since 2011 and has a global diversity, equality and inclusion program to reflect its commitment to these values. We may gather and process equality and diversity information to support and demonstrate this commitment.

We often take photos and videos at various Teleperformance events. However, inclusion in any publication is entirely voluntary. If you wish to attend and be included in photos or videos that will be published in line with the events aims, you must first have acknowledged the event consent communication sent out by the event coordinator via CCMS or other approved method.

A privacy impact assessment will be performed for new process that potentially may have a significant impact on personal data.

How we process your personal data

We may collect, share, or disclose the following categories of personal data for a business purpose. Here are some examples of personal data categories and processing activities at Teleperformance:

Maintaining basic contact information such as email address, name, home address & emergency contact information, and other information (such as photos or government ID) that verifies your identity.

Compiling and executing relevant data for employment management purposes: payroll; financial requirements; pension and/or retirement plans; medical insurance; company equipment assignment and usage (e.g. computer, car, phone, laptop) corporate communications, and marketing.

Documentation, registration and compilation of information contained in your performance review & interviews, training, grievance, and disciplinary records together with related internal investigation documents.

Recording and archiving of other information produced during your employment relationship, including dates of holiday and sick leave, health certificates or other form of statements of fitness for work.

Responding to and resolving your concerns about the workplace environment. In certain situations, you may provide information qualifying as protected-class information or sensitive information such as your race, gender, sexual orientation, etc. We gather this information only when required for employment, for the resolution of related workplace concerns, and to support our commitment to diversity, equality and inclusion.

Usage and Analysis of your personal data such as username, Hostname, internet data, and IP address in order to review any non-compliance with internal policies, investigations of information security issues, and for the detection and prevention of fraud.

Systems Monitoring, to the extent permitted by applicable law, the computer systems and tools used by you and allocated to you (“**TP IT Systems**”) for the purposes of Teleperformance conducting its business and to ensure that those TP IT Systems are being used in a lawful, appropriate, compliant and secure manner. Teleperformance routinely checks TP IT Systems device performance and connectivity information, including general geographic area, operating system and version, internet provider, IP address (local, public and, if applicable, IP from Virtual Private Networks (VPN)), software running simultaneously, hardware parameters, drivers, components, and peripherals. Types of monitoring may include detection of account misuse (e.g., shared accounts, identity theft); detection of confidential data exfiltration via communication channels (e.g., chat, email); detection of unusual behavior (e.g., copy/paste confidential and/or unauthorized data from one app to another); blocking of unapproved activities (e.g., agent’s unapproved accessing of certain tools or the internet).

Listening and Recording, to the extent permitted by applicable law, of communication interactions during the performance of work (e.g., phone calls, emails, message conversations, etc.):

- At the Client’s request for the purposes of evaluation of services provided by Teleperformance (e.g., contractual KPIs); training/coaching of employees on the Client’s material; improvement of the quality of service (e.g., business intelligence, speech analytics); updating the services provided by the Client; compliance policy implementation; storage / archiving of interaction for retrieval for probative purposes in case of a claim; and/or storage / archiving of proof of the conclusion of a contract or execution of a contract.
- For Teleperformance for the purposes of: training/coaching of employees, improvement of their skills; evaluation of employees, for example to determine their variable pay; management of disciplinary procedures (e.g., following an incident of fraud or non-compliant behavior); and/or management of judicial and/or criminal procedures (e.g., following an incident of fraud or non-compliant behavior).

TP Coaching (audio/video recording sessions): Management uses TP Coaching to observe and evaluate interactions between agents and supervisors for purposes of training and employee performance improvement. TP Coaching sessions are recorded and/or stored for purposes of training/coaching of employees; improvement of their skills; demonstration of best practices/effective communication techniques; evaluation of services provided by Teleperformance to its Clients (e.g., contractual KPIs); training/coaching of employees on the Client’s material; and improvement of the quality of service.

CCTV and Access Control: To protect the security of our employees, visitors and business in our sites, Teleperformance uses CCTV and video, security badges (including photo identification), and entry/exit logs to monitor building access points and to secure areas and systems.

Biometric identification may be used only where the level of risk justifies the additional control.

For Teleperformance employees in a work-at-home environment: Your work-at-home area will have a camera to enable team collaboration, protect confidential information, and ensure compliance with Teleperformance's and its Clients' privacy and security requirements.

There are a number of situations when the camera must be on during the work shift in order to facilitate collaboration and team management to achieve the most effective communication and provision of services, including but not limited to during 1-to-1 meetings, coaching sessions and team meetings, and so that your manager can verify your identity and conduct routine clean desk reviews.

When the camera is on, it does not automatically record. Whenever recording is required (for example, when needed for business purposes, in a chatroom where you are present, or for informational sessions delivered by Teleperformance Representatives), the 'recording icon' will show and you will be able to turn off your own individual camera during the recorded session if you choose to do so. There may be other voluntary Teleperformance-sponsored virtual activities in which you may choose to participate either with or without your camera (e.g., virtual breakroom, Citizen of the World activities, and the For Fun Festival).

You may be working on a client account that requires extra security measures, for example, if you are processing sensitive personal customer data on behalf of a client. If extra security including camera use for security purposes is required, then Teleperformance will provide you with notice and detailed information about all camera use for security purposes.

Sharing your personal data

We do not sell your information to third parties or use your information to provide financial incentives to you. As stated above, Teleperformance, in furtherance of its legitimate interests and in order to fulfill its legal and regulatory obligations, provides information gathered pursuant to this Agreement to third parties including its affiliates, Clients, service providers, and regulatory, administrative or judicial authorities.

Here are some examples of when it is necessary to disclose your information to third parties:

- For payroll processing, taxes, and benefits administration
- Background checks, anti-theft, security, and fraud prevention
- To our Clients in relation to the provision and oversight of the services we provide
- As required by government entities such as labor enforcement authorities

Storing your personal data for no longer than is required

We will retain your personal data for as long as is necessary for the purposes set out above, or for as long as is required by law or by our Clients.

Exercising your rights

As a data subject, you have rights relating to your personal data, such as the right:

- **To be Informed** about any processing of your personal data.
- **To Access** any and all data that we may have on you. However, we may charge you for the reproduction costs.
- **To Object** to the processing of your personal data, in general or for a particular purpose. In addition, if we use your personal data for a different purpose than what was originally communicated and collected, we will ask for your consent to process the data for this new purpose, and you have the right to object to the same.
- **To Erasure or Blocking** if you no longer want us to process your data, withdraw your data from our system, or you want all your personal data in our possession destroyed, provided, that any of the circumstances enumerated under Section 34(e)(1) of the DPA are present.
- **To Rectify** if any personal data we have on you is inaccurate or wrong, you have the right to have it corrected immediately, unless your request is vexatious or otherwise unreasonable.
- **To Data Portability** which allows you to obtain and electronically move, copy, or transfer your personal data in a secure manner for further use. Note, that we may charge you for the reproduction costs if you choose to exercise this right.
- **To Damages** if you suffered damages due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal data, or other violation of your rights and freedoms as data subject.
- **To File a Complaint** if you feel that your personal information has been misused, maliciously disclosed, or improperly handled, or that any of your data privacy rights have been violated, you may file a complaint with the National Privacy Commission through their website: <https://privacy.gov.ph>.

Should you wish to exercise these rights, you may submit a request at <https://teleperformance.com/en-us/footer/data-privacy-policy/> or via your local Human Resources (HR) who may file the same on your behalf. If you have any questions, complaints and/or clarifications, you may contact the Data Protection Officer via email at:

| | <u>ENTITY</u> | <u>CONTACT DETAILS</u> |
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| 1. | TELEPHILIPPINES INCORPORATED (Alphaland, Antipolo, Bacolod, Cagayan de Oro, Cebu Insular, Davao, EDSA, Fairview, Fairview Terraces, | DPOTelephilippines@teleperformance.com |

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| | Mall of Asia, Molino, Octagon, Sucat and Vertis North sites) | |
| 2. | TPPH-FHCS, INC. (Ayala, Baguio, Cebu IT Park, Rockwell and Silver City sites) | DPOTPPH-FHCS@teleperformance.com |
| 3. | TPPH-CRM, INC. (Aura site) | DPOTPPH-CRM@teleperformance.com |
| 4. | TELEPERFORMANCE GLOBAL SERVICES PHILIPPINES, INC. (formerly Intelenet Global Philippines, Inc.) | DPOTeleperformanceGlobalServicesPhilippines@teleperformance.com |
| 5. | E-KONFLUX SOLUTIONS INC. | DPOE-KonfluxSolutions@teleperformance.com |

Acknowledgment and Consent

I acknowledge receipt of this Privacy Notice and I consent to the processing as set out herein.

Employee Name

Date

Contact details & links:

For your Country Privacy Lead (CPL) contact your HR representative to obtain details.

For our Binding Corporate Rules: [Privacy Policy](#)