

VFS GLOBAL PRIVACY NOTICE

1. Introduction

At VFS Global, we're committed to protecting and respecting your privacy.

This Privacy Notice explains how VFS Global and its worldwide companies & subsidiaries ("VFS Global," "we," or "us") handle your personal information when you enter into your employment contract with VFS Global or whether you enter into an agreement with VFS to provide services as an external consultant.

This Privacy Notice describes how we collect and use your data during and after your working relationship with VFS Global.

This Privacy Notice applies to current and former employees and candidates during the hiring process and to external consultants.

We may change this Privacy Notice from time to time, so please occasionally check this page to ensure that you're aware of any changes.

Concerning the services provided by VFS Global, this Privacy Notice describes:

- Who are we (VFS Global)?
- Services provided by VFS.
- Contact information of Data Controllers.
- How do we collect your personal information?
- <u>Lawful basis for processing your personal data.</u>
- How is your information used?
- How long do we hold your data for?
- Who do we share your information with?
- Transferring your personal information offshore.
- Your rights.
- How VFS protects your information.
- Monitoring.
- Technology.
- Contact us.



2. Who are we? (VFS Global)

VFS Global is the world's largest outsourcing and technology services specialist for governments and diplomatic missions worldwide.

VFS Global manages the administrative and non-judgmental tasks related to visa, passport, travel documents, identity management and other citizen services such as passport renewals for its client governments and diplomatic missions. This enables them to focus entirely on the critical task of judgemental assessment and decision making.

VFS Global provides certain logistic support to visa/ permit or travel document applications on behalf of its client governments and in accordance with the respective contracts with them regarding such services/ support.

Apart from the visa/ permit or travel document application processing services and citizen services, VFS Global also provides additional services called Valued Added Services (VAS).

2. Contact information of Data Controllers.

VFS Global is the data controller of your data. VFS Global is responsible for processing your data concerning your employment contract with VFS Global under the applicable data protection and employment laws in the country of employment and VFS Global's data protection and privacy policy. In the event of questions related to the processing of your data, you can contact by e-mail your designated HR responsible or VFS Global's Data Protection Officer at dpo@vfsglobal.com

3. How do we collect your personal information?

As part of the employment relationship, VFS Global may collect your personal data in the following manners:

- a. By accepting an employment offer of VFS Global
- b. When you submit requests to VFS Global;
- c. When you use the VFS Global's IT infrastructure;
- d. As part of the ongoing employment relationship.



4. Information collected by VFS Global

The following categories of personal data may be collected, held, and processed by VFS Global concerning your employment contract. You will be able to see and check all the categories of information and the correctness of your employee information in your dedicated HR Space.

Please note that the information listed below may vary depending on the requirements and restrictions of the local employment legislation governing your employment relationship with VFS Global.

- Contact Information
 - o Name
 - Surname
 - o Phone number
 - Emergency contact details
 - o Email
- Education History
 - o Degree/s
 - Courses
 - o Awards / Honours
- Personal Information
 - Marital status
 - Nationality
 - o Passport / ID / Work permit
 - Gender
 - Emergency medical details (including blood group were permitted and/ or required by the local legislation)
 - o Date of birth
- Employment details
 - o Employment history.
 - o Compensation/ salary/ benefits/



- o Place of employment/ geographical place of work
- Bank Details
 - Account number

VFS Global may make such information available to any of its subsidiaries or affiliates, payroll administrators, tax and social security administrators, regulatory authorities, and as may be required by law or the employer's employment obligations.

5. Lawful basis for processing your personal data.

In respect of the lawful basis used by VFS Global as a Data Controller of the information provided by you, VFS Global will only process your data if:

- The data processing is necessary for performing or entering into an employment contract.
- When we need to comply with a legal obligation as an employer, such as tax reporting.
- The data processing is necessary to secure a vital interest of yours as employee of VFS Global (such as emergency contact information from you and your family in the event of an emergency).

6. How is your information used?

We will use your information:

- To enable us to perform our role as your employer;
- To allow us to comply with the legal obligations we are subject to as your employer;
- For business operations and internal management purposes;
- For reports and analyses of VFS Global,
- For the protection of your vital interests.

7. How long do we hold your data for?

We will only retain your data as long as necessary to fulfil the purposes we collected it for (employment relationship), including the purposes of satisfying any legal, accounting or reporting contractual requirements.



Once you are no longer an employee of VFS Global, we will delete and securely destroy your data following our retention policy and applicable laws of your country of employment unless applicable laws or contracts require further retention.

We are legally required to hold some information during a more considerable period to fulfil our statutory obligations (for example, invoices for taxation legislation).

8. Who do we share your information with?

We may share your information with other companies of the VFS Global group where it is necessary for the processing of your data as part of the employment relationship.

Additionally, VFS Global may use a service provider for specific activities related to the employment contract activities, such as payroll service providers.

We only use partners with an adequate level of data protection measures.

9. Transferring your personal information offshore.

Your data may be transferred from VFS Global or its subsidiaries or affiliates outside your country to one of our data centers located in Europe, Canada, or Russia.

This international data transfer might be required:

- > To fulfill our obligations as your employer;
- > VFS Global's commitments with its Client Governments or
- Any public authority that requests us information about you.
- > To ensure the maximum data protection standards, the transfer of personal data to a country outside yours shall occur with contractual clauses or other data protection provisions by VFS Global.

10. Your rights

Under many data protection laws, you have rights with regard how your personal information is handled. These privacy rights vary from country to country, however in VFS Global we enable you to exercise a full range of data protection rights depending on the applicable jurisdiction. It includes among others:

- The right to be informed how your personal information is being used.
- The right of access and a copy of your personal information.



- The right to rectification if your personal information is incorrect.
- The right to erasure your personal information (where the law permits this).
- The right to restrict processing of your personal information.
- The right to data portability.
- The right to object to how your personal information is used.
- Rights in relation to automated decision making and profiling.
- Registering a concern about data privacy
- Requesting a copy of your personal data, correcting inaccurate personal data, deletion of personal data.

You can exercise you rights by contacting your HR manager, write to the DPO at dpo@vfsglobal.com or use our Personal Data Request Form available at

DATA SUBJECT ACCESS RIGHTS FORM

a. Accessing your information: Authentication.

In order to protect your privacy and to authenticate that the request is genuinely from you and not from anyone else masquerading as you, we might request some additional details of your last interaction with VFS Global, some details that nobody else would know about.

This is to ensure that it is really you who is making the request and not someone else. We will only request enough information to enable us to identify you.

11. How VFS protects your information

When you give us personal information, we take steps to ensure that it is treated securely. Any sensitive information is encrypted and protected.

On our websites when you are on a secure page, a lock icon will appear in the address bar of most web browsers. This means the transfer of information from your browser to our web servers is encrypted to keep it safe.

Please bear in mind that emails may be transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, do not include personal information in an email when you communicate with us, if you do, you do so at your own risk.



12. Monitoring

a. CCTV

Please note that in VFS Global premises we intent to maintain the highest security standards in place for our staff and customers. For this reason, you will find that VFS Global uses CCTV systems where the law permits so.

The required CCTV signs are deployed in our VACs and offices and indicates that you are being recorded. This CCTV footage is kept for a certain period of time in line with our client governments / diplomatic missions' requirements and applicable local laws.

b. Guarding services.

As part of our security standards, you may find deployed in our VACs and offices guarding services. In certain locations you will be required to identify yourself prior to access our VACs and premises.

13. Technology

a. Use of cookies.

Like many other websites, the VFS Global websites use Cookies. 'Cookies' are small pieces of information sent by an organisation to your browser and stored on your device. One purpose we use them for is to help collect statistical information about your browsing actions and patterns, but they do not identify you as an individual to us. Other uses are to set your preferred language and tell your browser what pages you have already visited so that you can use the "Back" function. Cookies help us to improve our websites and deliver a more personalized service.

We provide the choice for you to accept or refuse the use of cookies when you visit our websites, and you can change the cookie settings at any time.

Please note that disabling cookies may result in a loss of functionality when using our website. For more detailed information about how VFS Global uses cookies, please see our Cookies disclosure notice.

b. <u>Links to other websites.</u>

Our websites may contain links to other websites run by other organizations. This Privacy Notice applies only to this website, so we encourage you to read the privacy statements on the



other websites you visit.

Please, note that, if you link from our website to another website, or if you follow a link to arrive at our website, we cannot be responsible for the practices of those third-party websites and we recommend that you check the Privacy Notice of that third-party website.

We always perform a check of other websites before publishing a link to it.

14. Contact us.

We understand that you may have questions about our privacy practices. Please feel free to contact us in one of the following ways:

Information relating to data protection and
privacy practices:

by using our <u>SAR form</u> or by contacting <u>dpo @vfsglobal.com</u>