

VFS GLOBAL PRIVACY NOTICE

1. Introduction

At VFS Global, we're committed to protect and respect your privacy.

This Privacy Notice explains how VFS Global and its worldwide companies & subsidiaries ("VFS Global," "we," or "us") handles your personal information.

We may change this Privacy Notice from time to time. We will always make the latest Privacy Notice available to you via this page. Any changes to this privacy policy will apply to you and your data immediately.

In respect to 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?
- Lawful basis for processing your personal data.
- 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 only 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).

3. Services provided by VFS Global.

- a. Processing your visa, passport, identity management and other citizen services (such as passport renewal).

VFS Global is the outsourced partner of client governments and diplomatic missions for managing the administrative and non-judgmental tasks related to visa, passport, travel documents, identity management and other citizen services. In this capacity, VFS Global (through its visa application centres (VACs)) is merely responsible for receipt of visa/ permit or travel document applications, collection of biometric data where applicable, collection of documents to accompany applications on behalf of the respective client government/ diplomatic mission; submission of applications and biometric data to the client government/ diplomatic mission for their consideration; collecting passports from visa applicants and returning passports back.

VFS Global has no role to decide what documents are to be appended or what comments or details need to be made in the visa, passport, or travel documents application process.

b. Additional services as our customer.

VFS Global also offers an additional range of Value Added Services to its customers who wish to procure this directly from VFS.

Please, note that the availability of our VAS may vary from country to country. The services are completely independent of your visa/ permit or travel document application procedure and might be purchased as per your needs.

The VAS offered by VFS Global is a purely optional/ discretionary service, which are been offered by VFS Global to the customer directly available under a contract between VFS Global and the customer at an additional service charge.

Availing of this service does not affect or guarantee the decision or processing time of your visa/ permit or travel document in any manner as it is completely dependent on the client government/ diplomatic mission decision.

4. Contact information of Data Controllers.

a. When processing your visa, passport, identity management and other citizen services (such as passport renewal).

The client government/ diplomatic mission of the country you applied a visa/ permit or travel document for is the responsible party for the use of the personal data you provide in the visa/ permit or travel document application form and consequently, for the data received from your side in connection with the processing of your visa/ permit or travel document application.

This role is known as “Data Controller” as established in the Regulation (EU) 2016/679 (General Data Protection Regulation). However, can have different names such as “*Organisation*”, “*Data Fiduciary*” “*Data Handler*” or similar depending on your country of residence.

As VFS Global provides services on behalf of different client governments and diplomatic missions across the globe, to know how the Data Controller (client government & diplomatic mission) of your visa/ permit or travel application collects and uses your personal data, please ensure to check the privacy notice included on our website page for the route of the specific visa/ permit or travel document you are applying for.

- i. The website of the specific route you are applying a visa/ permit or travel document for where your applicable Data Controller information appears. You can go to VFS Global

corporate website section **“Visas, eVisas & Permits”**.

- ii. Additionally, if you are applying for a Schengen country, please refer to the Privacy Notice or the Disclosure section of the applicable application form you have filled where the Data Controller details are included.

- b. When providing you with Value Added Services as our customer.

When VFS Global provides additional services requested by you, such as but not limited to appointment scheduling at a Visa Application Centre (VAC), application/ document tracking and transmittal, provision of self-service visa application workstations, document courier delivery services, etc., VFS Global is responsible for processing the personal data you provide in connection with these services, hence VFS Global is the Data Controller for these VAS.

The contact information for VFS Global when acting as a Data Controller for the VAS provided to you is:

VF Worldwide Holdings Ltd,

Unit 3105, 31st Floor,

Jumeirah Business Centre, 1 Tower, Cluster G, 1 / 6 Jumeirah Lakes Towers,

P.O. Box 114100, Dubai, UAE.

or email: Data Protection Officer

5. How do we collect your personal information?

VFS Global collects information about you when you request our services either as part of your visa/ permit or travel document application process or when you purchase any of the VFS Global's VAS.

- a. When processing your visa, passport, identity management and other citizen services (such as passport renewal).

VFS Global is authorized by the client government/ diplomatic mission we work on behalf of to perform administrative support and biometric collection services related to processing of visa/ permit, and travel document applications.

Depending on the country you applied a visa/ permit or travel document for, the personal data required from you may change but it is always determined by the client government/ diplomatic mission who controls the personal data that is to be collected, used, and transferred by VFS Global as part of the visa application process.

A comprehensive list of the data required from you for each of the different visas/ permits or travel applications, is included in the VFS Global's dedicated website for the respective visa/ permit or travel application routes at **"Visas, eVisas & Permits"**.

Your information is collected by a member of VFS Global staff or authorised partners when you contact a Visa Application Centre (VAC) for submitting your visa/ permit application form or for providing your biometrics as requested by the client government/ diplomatic mission you applied a visa/ permit or travel document for.

b. When providing you with additional services as our customer.

If you contact our customer support centre, or when you provide these details in a web form on our websites or when you request any of VFS Global's VAS, VFS Global processes the information provided by you in order to deliver the service requested. Such information may consist of:

- First Name
- Last Name,
- Delivery Address,
- Email address,
- Mobile Phone Number.
- We may also collect your date of birth to identify you when using the Track & Trace service.
- Application reference number

Please note that it is not mandatory to provide your personal data for requested Value Added Services. However, without providing the required personal data, we may not be able to deliver these services.

c. Children's privacy protection

Our services are not designed for, or intentionally targeted at children. When we process data from children, we will require parental consent.

6. Lawful basis for processing your personal data.

- a. When processing your visa, passport, identity management and other citizen services (such as passport renewal).

In respect of the lawful basis used by the respective client government / diplomatic mission as Data Controllers of the visa/ permit application process, you may need to provide your consent as part of the visa /permit application process. For further details on the content of this consent you are required to provide, please check the visa application/ permit form where the same is explained.

Please note that each of the client government/ diplomatic mission has its own application form, which means that there is not a unique consent and the same may vary depending on the country you applied a visa/ permit or travel document for.

- b. When providing you with additional services as our customer.

If the data protection law in your country of residence allows, VFS Global will use the lawful basis of “performance of contract”. What this means in plain terms is that when you purchase a VAS from VFS Global, you enter into a contract with us to deliver that service. We could not deliver that service without using some personal data from you, by entering into that contract implies this you have given your permission for us to process that personal data. For example, in order to provide the courier service, we will need a delivery address.

If the data protection law in your country of residence does not have the lawful basis of “performance of contract”, then VFS Global will ask for your consent for the processing of your personal data for one or more specific purposes.

7. How is your information used?

- a. To process your visa, passport, identity management and other citizen services (passport renewal)

As per the visa / permit or travel document application process, the information collected by VFS Global on behalf of the client government/ diplomatic mission is submitted to them for the assessment of your visa/ permit or travel document applications.

Please note that VFS Global (or any member of its group of companies or staff) does not take any part on the decision making process and the grant or refusal of any visa/ permit or travel document application.

This assessment is carried out at the sole discretion of the client government/ diplomatic mission as the Data Controller of this process, which reserves the right to ask for further documentation and information for the visa/ permit or travel document you have applied for and, to refuse any visa/ permit application. You must supply such further documentation and information if you wish the application to continue to be considered.

Please do note that VFS Global's role as a Data Processor as defined in the Regulation (EU) 2016/679 (General Data Protection Regulation), of the respective client government/ diplomatic mission regarding the visa/ permit or travel document process, is restricted to solely handle non-discretionary and non-advisable documentation on behalf of the concerned client government/ diplomatic mission, purely as an administrative/logistics measure and cannot comment on the documents shared by you for forwarding to the concerned client government/ diplomatic mission.

- b. To provide you with additional services as our customers.

In its role of Data Controller when providing VAS, VFS Global will use your information for:

- i. Book an appointment with one of our visa submissions officers at a Visa Application Centre (VAC);
- ii. Validate who you say you are when you come to collect your travel document;
- iii. Enable you to track the progress of your application;
- iv. Provide you with additional services that you request such as courier delivery for which we will need to know the delivery address and the name of who to deliver the travel document to;
- v. With your prior permission, to send you information which you have requested and that may be of interest to you.

8. How long do we hold your data for?

- a. For VISA application

Your visa application data is deleted from VFS Global's systems after its transmission to the client government/diplomatic mission.

Only your name and contact details, as well as the passport number, are retained for the purposes of the appointment arrangements.

For visa application of Schengen countries, this personal data is kept until the return of the passport to the applicant and deleted five (5) days thereafter.

For visa application of all other countries, this personal data is kept until the return of the passport to the applicant and deleted thirty (30) days thereafter.

If you contact us with follow-up questions or a complaint, we may retain your contact information and any other information provided for the time it takes to resolve your matter.

We are legally required to hold some types of information during a larger period of time to fulfil our statutory obligations (for example; invoices for taxation legislation).

b. For Value Added Services:

We retain, for a limited time, a small amount of personal contact information in order to be able to perform a requested service, such as courier delivery of your travel documents. This information is retained in order for us to deal with any queries or issue that may occur.

9. Who do we share your information with?

a. When processing your visa, passport, identity management and other citizen services (such as passport renewal).

We share your personal information with the respective client government/ diplomatic mission that we are an authorised service provider. This information includes the personal information supplied by you to support your visa/ permit or travel document application, consular service, or other service that we provide on behalf of a client government/ diplomatic mission.

We may also share your personal information with the client government/ diplomatic mission whose visa, consular service, or any other service you applied for, in connection with a complaint, request or data access request, received from you.

b. When providing you with additional services as our customer.

We may share your contact information with other partners where it is necessary for the

processing of your requests or to deliver an additional service that you have requested for. For example; if you have asked us to deliver your travel document to your home or office, we will need to provide the courier company with your name, delivery address and a contact phone number.

We only use partners that have adequate level of data protection measures in place.

c. We do not sell your data to third parties

We will never sell your personal data to third parties as this is set out in our internal Privacy Policy.

10. Transferring your personal information offshore.

a. When processing your visa, passport, identity management and other citizen services (such as passport renewal).

As part of the visa/ permit or travel document application process, the information collected by VFS Global on behalf of the client government/ diplomatic mission you applied a visa/ permit or travel document for will be transferred offshore, from the country of your application to the home country of the client government/ diplomatic mission.

b. When providing you with additional services as our customer.

In order to provide a service to support your visa application such as appointment scheduling, tracking your application and invoicing, we will transfer your personal information, internally within VFS Global, to one of our data centres located in Europe, Canada or Russia as applicable.

The sharing of your personal data with certain recipients may imply transfers of your data out of the European Economic Area (EEA) We pay particular attention to the protection of your personal data. Thus, where such transfers out of the EEA shall take place, we first implement appropriate safeguards by signing the standard contractual clauses of the European Commission with the entity out of the EEA which processes your personal data.

11. Your rights

a. Data Subjects rights in relation to the processing of your visa, passport, identity management and other citizen services (such as passport renewal).

As an authorised contractor of the client governments/ diplomatic missions we work with, VFS Global has no access to the information submitted by you as part of your visa/ permit or travel document

application. This includes copies of your visa application, or any information submitted by you in connection with your visa application.

If you require this information, you need to directly contact the Data Controller of the respective client government/ diplomatic mission of the country whose visa you applied for, and which details are provided in the respective privacy notice of the specific website route of the visa/ permit or travel document you applied for.

b. Data Subjects rights in relation to the additional services provided to you as our customer.

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 VFS Global at:

**DATA SUBJECT ACCESS RIGHTS
FORM**

c. 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.

12. 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.

13. Monitoring

a. CCTV

Please note that in VFS Global premises we intend 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.

14. 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 with this button.

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. Links to other websites.

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.

15. 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:

1. Visa applications/ status related matters:	by contacting our <u>Customer Care Team</u> .
2. Additional Services (VAS):	such as insurances, hotel bookings, priority lounge, pricing, and general information: by contacting our <u>Customer Care Team</u> .
3. Information relating to data protection and privacy practices & matters:	by using our <u>SAR form</u> or by contacting <u>dpo @vfsglobal.com</u>