

This is the Employee Data Protection Notice Policy that is applicable to your application for employment.

Concentrix CVG Customer Management Colombia S.A.S, its affiliates, provides this recruiting and employee data protection notice ("Notice" also referred herein as "Policy") to explain our practices as the responsible controller regarding the collection, processing, and use of personal data relating to applicants and our employees in connection with employment at Concentrix. The Notice considers the requirements of the Colombian data Privacy Rules, and shall replace the existing employee data protection notice.

The broad term personal data can be understood as any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number (e.g., IP-address, employee ID) or location data.

The term processing can be understood as any use or operation which is performed on personal data. That means, anything one can do with personal data, such as collection, recording, organizing, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, dissemination, transfer or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing includes asking a person for information, logging and analyzing network traffic and accessing a database.

This document is not part of the employment contract, and we may update it from time to time in accordance with applicable law.

Scope

This Notice applies to you if:

- You are a job applicant or other potential employee of Concentrix;
- You are a full or part-time, current or former employee (including student) of Concentrix.
- You are an Independent Contractor for Concentrix.

Policy

Concentrix' Colombia Data Protection Notice Policy is as follows:

Categories of Personal Data

The following table provides a summary of categories of personal data we may process about you.

Categories of Personal Data	
Recruiting Data	<u>Category 1: General applicant information, such as:</u> Full name, academic title(s), gender, email address;
	<u>Category 2: Additional personal information, such as:</u> Former names, date and place of birth, marital status, private contact information (e.g., private address, private phone no.), photo, language skills;
	<u>Category 3: Passport and similar information, such as:</u> National ID card information, passport information, nationality or citizenship, work permit information (e.g., type and status, valid until), visa information (e.g., type and status, valid until), student status;
	<u>Category 4: General contract and employment related information, such as:</u> Contract type (e.g., regular, temporary, limited), employment start date, educational background, professional experience and abilities (e.g., CV, former training), employment applications, previous work history, references, expected compensation, any correspondence with you (e.g. letter, emails); Additional information you provide on voluntary basis, such as information contained in documents you provide.
General employee data	<u>Category 1: General employee information, such as:</u> Full name, academic title(s); gender; workplace address; workplace contact information (e.g., work e-mail address, work phone no.); employee ID or personnel number; job code, title or function; general ledger code; department; organizational unit, etc.; supervisor, manager or reporting lines; cost center number or allocation
	<u>Category 2: Additional personal information, such as:</u> Former names; date and place of birth; marital status; private contact information (e.g., private address, private phone no.); photo; language skills; emergency contact information
	<u>Category 3: Passport and similar information, such as:</u> National ID/ foreigner ID; social insurance number; health insurance / fund; social security number; tax ID; nationality or citizenship; work permit information (e.g., type and status, valid until); student status
	<u>Category 4: Information on dependents, such as:</u>

	<p>Number of dependents; other dependent details (e.g., name, date of birth, relationship, contact details, national ID, nationality or citizenship), if information provided voluntarily¹ – this may also contain dependents' special categories of data (such as dependents' sickness, dependents' disability incl. grade of disability)</p>
	<p><u>Category 5: General contract and employment information, such as:</u></p> <p>Contract type (e.g., regular, temporary, limited); employment start and end date; employment status (e.g., active, on leave, terminated); work period (weekly/monthly/etc.); average working hours; probation period; days of vacation per year; employee attendance data (e.g., time records, paid time off, leaves, absences, time in lieu); project allocation(s); educational background; professional experience and abilities (e.g., CV, former training); previous work history, including past employers and reasons for termination of employment; declarations provided by employee (e.g., privacy consents, confidentiality undertakings); information contained in business documents (emails, letters)</p>
	<p><u>Category 6: Performance, talent and similar information, such as:</u></p> <p>Performance reviews or ratings; appraisals and awards; evaluations; development plans; training; special skills; education; discipline; reason for employment action (hire/rehire/termination); voice recording</p>
	<p><u>Category 7: Payroll, compensation and benefits information, such as:</u></p> <p>Salary administration plan; salary grade; salary amount; severance amount; supplemental salary; compensation rate code; compensation rate; overtime compensation; bonus compensation; other leave compensation; not taken holidays compensation; other variable compensation (also from other employment relationships); participation in stock option plans; number of payments per year; eligibility for bonus plan (including type and target percentage); eligibility for various benefit plans; capital-forming benefits; bank account information for payments; currency for payments; travel allowances; car or commuting allowances; night shift allowances; working on Sunday / holiday allowance; relocation package allowance</p>
	<p><u>Category 8: Information on IT assets and use, such as:</u></p> <p>Eligibility to access computer systems and networks, including access rights and credentials; IT assets allocated to the employee (e.g., laptop, cell phone); log file information and other information on IT use (e.g., IP address, last login, applications used); chip card data (e.g., access badge); video images and CCTV</p>
<p>Sensitive employee data</p>	<p><u>Special categories of personal data ("Sensitive Employee Data"), such as:</u></p> <p>Information concerning health (including medical exams, number of sick days, injuries in with work place accident, pregnancy and due date, serious disabilities, as far as communicated); disability (voluntary, for additional vacation days); religious affiliation; trade union membership; biometric data (only if applicable)</p>

¹ If you provide such data to us please ensure that your dependents are aware of the data processing activities described in this notice.

Please note that Concentrix, may not process all categories of personal data listed in the table above, since some of these personal data will only be processed upon country-specific requirements or country specific benefits provided by Concentrix as your employing entity. In any case, we will take care to avoid processing such personal data about you, for which processing is deemed unlawful in the country where Concentrix, as your employing entity, is located.

We may collect these personal data directly from you (e.g., during the onboarding process, if you provide certain certificates or documents, or during the employment relationship) or may obtain these personal data from authorized third parties (e.g., your supervisor, public authorities or public resources) as permitted by applicable law.

2.1 Processing Purposes and Legal Basis, and Consequences.

The following table provides a summary with regard to which category of personal data (as indicated above) we process for certain purpose and on which legal basis Concentrix relies on in this respect:

Processing Purposes
<p>General Human Resources management, such as:</p> <p>Personnel administration, redeployment of employees, discipline management, meeting quotas, ensuring equal opportunities, leave and absence management</p>
<p>Workflow management, such as:</p> <p>Assigning, managing, and administering projects and staff</p>
<p>Payroll management, such as:</p> <p>Compensation and benefits administration and incentive programs, deductions, allowances, taxes, business expense reimbursement, statutory wage tracking</p>
<p>Communication related management, such as:</p> <p>IT helpdesk and support services, provision of internal communication such as email, instant messaging, and phone</p>
<p>Performance and development management, such as:</p> <p>Developing goals for leadership training and promotion, succession planning</p>
<p>Security of the sites, facilities and assets, such as:</p> <p>Limiting and restricting access to authorized persons, management and protection of company assets</p>
<p>Occupational safety and health related issues, such as:</p> <p>Reporting and investigating workplace accidents, health and assistance in case of emergency, disability and other special workplace requirements</p>

<p>Corporate related issues, such as:</p> <p>Carry out corporate tasks and achieve our business objectives, corporate planning, monitoring and enforcing compliance with company policies and procedures, compliance with statutory reporting obligations, compliance with contractual obligations and risk management, statistic purposes, evaluating a potential disposition of all or part of a corporate entity</p>
<p>Recruiting and hiring activities, such as:</p> <p>Administering your recruitment, making a hiring decision (including assessing qualification and tracking candidates during the application process, security assessments (including criminal records and credit checks where permitted by local law) and carrying out interviews), and completing the hiring process in case you should be offered and accept a position with Concentrix (including activities related to on-boarding and the new hire process)</p>

Complying with applicable laws and employment-related requirements along with the administration of those requirements, such as employment and immigration laws communicating with you, within the Concentrix group, and/or with third parties responding to and complying with requests and legal demands from regulators or other authorities.

The processing of such personal data for the purposes above may be carried out by the following departments or bodies (inter alia): Human resources, legal, IT, employee representation (such as works council, union representatives), accounting, payroll, sales, matrix manager.

The provision of personal data as described above is partly a statutory requirement, partly a contractual requirement under your employment contract, and partly a requirement to carry out the employment relationship with you. In general, you are required to provide such personal data, except in limited instances when we indicate that certain information is voluntary (e.g., in connection with employee benefits). Not providing the personal data may prevent Concentrix from carrying out the employment relationship with you and may require Concentrix to terminate your employment.

The provision of Recruiting Data and Sensitive Data as described in this Notice is partly a statutory requirement, partly a (pre-) contractual requirement under the terms of our recruiting website, and partly a requirement to carry out the recruitment and hiring process with you. In general, you are required to provide the Recruiting Data, except in limited instances when we indicate that certain information is voluntary. Not providing the Recruiting Data and Sensitive Data may prevent Concentrix from carrying out recruiting and hiring activities as they relate to you and may require Concentrix to terminate your application and cease consideration of you for potential employment with Concentrix.

Categories of Recipients.

You should expect that we will transfer your personal data (especially with regard to Sensitive Employee Data only as permitted by applicable law) to third parties for the processing purposes as follows:

- **Within the Concentrix group:** Our parent entity, Concentrix Corporation (44111 Nobel Drive, Fremont, California 94538, USA)) and each of its affiliates and subsidiaries (each affiliate or subsidiary including us referred to as "Concentrix Affiliate"; collectively, the "Concentrix Group") within the global Concentrix Group Exhibit A – List of Processors & Affiliates may receive your personal data as necessary for the processing purposes set out above, in particular for general human resources management, workflow management, communication related management, performance and development management or for corporate related issues.
- **With certain clients:** Existing or potential clients may receive certain personal data about you, such as general employee information (Category 1 data), performance, talent and similar information (Category 6 data) and information on IT assets and use (Category 8 data). Such data will be used by the clients for granting access to their IT systems, for verifying compliance with the job requirements of the client and for other limited purposes.
- **With certain third parties:** Other existing or potential business partners, public authorities, suppliers and our customers, will receive your identification data, contact details, and information about your job and, in addition, independent external advisors (such as auditors or legal advisors), insurance carriers (such as health care providers), benefit providers (such as pension providers), and other third parties may also receive information about your salary and benefits, and information about your equity compensation as necessary in connection with our business operations, in particular to administer and provide compensation, administer and provide applicable benefits and other work-related allowances, administer the workforce, comply with applicable laws and employment-related requirements, communicate with you and third parties, and respond to and comply with requests and legal demands.
- **With certain acquiring or acquired entities:** If Concentrix, being your employing entity, is sold or transferred in whole or in part or if the Concentrix Group is acquiring and integrating another entity into Concentrix, being your employing entity, (or any similar transaction is being contemplated), your personal data will be transferred to the other entity (e.g., the new employer, potential new employer, the new acquired entity, or potential new acquired entity) prior to the transaction (e.g., during the diligence phase) or after the

transaction, subject to any rights provided by applicable law, including jurisdictions where the other entity is located.

- **With data processors:** Certain third party service providers such as IT support or HR support providers, whether affiliated or unaffiliated, will receive your personal data to process such data under appropriate instructions ("Processors") as necessary for the processing purposes set out above. In particular, for general human resources management, workflow management, payroll management, communication related management, performance and development management or corporate related issues we may use Processors. The Processors will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the personal data, and to process the personal data only as instructed. A list with all currently engaged Processors can be found here Exhibit A – List of Processors & Affiliates.

Any access to your personal data is restricted to those individuals that have a need-to-know in order to fulfill their job responsibilities. Concentrix will also disclose your personal data as required or permitted by applicable law to professional advisors, governmental authorities and courts.

2.2 International Transfers.

You should expect that the recipients identified above which will receive or have access to your personal data, are located inside or outside the European Economic Area ("EEA") and the United Kingdom.

- For recipients located outside of the EEA and the United Kingdom, some are located in countries with adequacy decisions pursuant to Art. 45 GDPR. Those recipients are located in Canada (incl. Nova Scotia) (for non-public organizations subject to the Canadian Personal Information Protection and Electronic Documents Act), and, in this case, the transfer is thereby recognized as providing an adequate level of data protection from a European and United Kingdom data protection law perspective.
- Other recipients are located in countries which do not adduce an adequate level of protection from a European and United Kingdom data protection law perspective (in particular, the USA), Australia, China, Colombia, Egypt, El Salvador, Honduras, India, Indonesia, Malaysia, Mauritius, Nicaragua, Philippines, Singapore, Tunisia). We will take all necessary measures to ensure that transfers out of the EEA and the United Kingdom are adequately protected as required by applicable data protection law.
 - With respect to transfers to countries not providing an adequate level of data protection, we will base the transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission or by a supervisory authority (Art. 46(2)(c) or (d) GDPR), approved codes of conduct together with binding and enforceable commitments of the recipient

(Art. 46(2)(e)), or approved certification mechanisms together with binding and enforceable commitments of the recipient (Art. 46(2)(f) GDPR). You can ask for a copy of such appropriate safeguards by contacting us as set out in Section 8 below.

- The data transfer to Concentrix Affiliates is protected by standard data protection clauses adopted by the European Commission (Art. 46(2)(c) or (d) GDPR).
- The data transfer to Processors which are not located in a country with other adequacy decision will typically also be protected by such standard data protection clauses.

Retention Period.

Your personal data is stored strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the personal data is collected, in accordance with applicable data protection laws. When Concentrix no longer needs to use your personal data, we will remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it (unless we need to keep your personal data to comply with legal or regulatory obligations to which Concentrix is subject).

Further details can be found in our Retention Policy. Please contact us as stated in Section 4.7 below for further information.

Your Rights.

In accordance with the provisions of article 8 of Law 1581 of 2012, if The Company is processing your personal data, you have the following rights:

- a) Know, update and correct your Personal Data. This right may be exercised, among others, in relation to partial, inaccurate, incomplete, split, deceptive data, or whose processing is prohibited or not authorized.
- b) Request proof of the consent granted to Concentrix to collect and process your Personal Data.
- c) Be informed by Concentrix of the use that has been given to your Personal Data, if requested in advance.
- d) Submit complaints to the Superintendence of Industry and Commerce for violations by Concentrix of the provisions of Law 1581 and other rules that modify, add or complement said Law.
- e) Revoke the authorization you have granted to Concentrix for the processing of your Personal Data.
- f) Request to Concentrix to remove you from its databases.
- g) Access your Personal Data that Concentrix has collected and processes.

To exercise your rights please contact us as stated in Section 4.8 below.

The Person Or Area Responsible To Attend To Your Queries, Requests Or Claims Related To The Processing Of Your Personal Data.

If you have any queries, consultations or claims related to your personal data, you can contact our data privacy officer through this email: DPO@Concentrix.com, you may exercise your rights to know, update, rectify or suppress your personal data and revoke the consent you granted to Concentrix for the processing of your Personal Data, before Concentrix privacy officer.

The Procedures to Exercise Your Rights.

Any query or consultation in relation to your Personal Data collected and processed by Concentrix, will be processed by Concentrix, for which you will have to send a written description of your consultation to DPO@Concentrix.com.

Inquires Procedures.

In accordance with the provisions of article 14 of Law 1581 of 2012 you as data subject or your successors may consult your personal information that is in any database from Concentrix.

Consequently, Concentrix will guarantee the right of consultation, providing you or your successors, all the information contained in the individual record or that is linked to the identification of you as a data subject.

For the attention of requests of consultation of personal data, Concentrix has enabled the e-mail DPO@Concentrix.com, and in this regard, Concentrix guarantees that they will be attended within a maximum term of ten (10) business days counted from the date of receipt. When it is not possible to attend the consultation within said term, the interested party will be informed before the expiration of the 10 days, stating the reasons for the delay and indicating the date on which the consultation will be attended, which in no case may exceed five (5) business days following the expiration of the first term.

Claims Procedure.

In accordance with the provisions of article 15 of Law 1581 of 2012, you as data subject or your successors when consider that the information contained in a database should be subject to correction, updating or deletion, or when you/they notice the alleged breach of any of the duties contained in Law 1581 of 2012, may submit a claim to Concentrix. This claim will be processed by Concentrix under the following rules:

- a) The claim may be presented by you as the data subject or your successors, taking into account the information indicated in the format (s) that Concentrix has provided for that purpose.

If the claim received does not have complete information that allows processing, that is, with the identification of the data subject, the description of the facts that give rise to the claim, the address, and the documents that it wants to enforce, the interested party will be required, within five (5) days after receipt, to correct the faults. After two (2) months from the date of the request without the applicant submitting the required information, it shall be understood that the claim has been abandoned.

If for any reason a claim is received that should not be directed against Concentrix, it will transfer, as far as it is possible, to the corresponding party within a maximum period of two (2) business days, and will report the situation to the interested

- b) Once the complete claim has been received, a legend that says "claim in process" and the reason thereof will be included in the database maintained by the controller, within a term not exceeding two (2) business days. This legend must be maintained until the claim is decided.
- c) The maximum term to attend the claim will be fifteen (15) business days counted from the day following the date of its receipt. When it is not possible to attend it within said term, the interested party will be informed before the expiration of said period of time of the reasons for the delay and the date on which his claim will be handled, which in no case may exceed eight (8) business days following the expiration of the first term.

Revision History

Rev. No.	Revision Date MTH-YYYY	Author's First Initial and Last Name	Reason for Revision / Description of Changes
1.0	Sept-2018	D. Howell, VP & Assistant General Counsel	New Policy
2.0	Dec-2020	P. Gearin, Sr. Director, Regulatory Compliance and Privacy	Update to Policy to reflect entity name change – and ownership change

Exhibit A – List of Affiliates and Processors

(Affiliates of Concentrix Corporation provide processing / hosting services and other support services)

Company Names /Razón social de la Compañía	Number Of document/ Número de identificación	Country/País
Concentrix International Europe B.V.	980182894	Netherlands/ Países Bajos
Convergys Philippines, Inc.	980467478	Philippines/ Filipinas
Concentrix CVG CMG UK Limited	980419259	United Kingdom /Reino Unido
Concentrix CVG Intelligent Contact Ltd.	5088657005 512	United Kingdom /Reino Unido
Intervoice Limited	980499382	United Kingdom /Reino Unido
Concentrix CVG Corporation	311598292	US / Estados Unidos
Concentrix CVG Customer Management Group Inc.	311260729	US / Estados Unidos
Convergys Customer Management International Inc.	311284406	US / Estados Unidos
Intervoice, LLC	751927578	US / Estados Unidos