

Concentrix Philippines
Recruitment Data Privacy Notice

Concentrix remains committed to protecting the privacy and confidentiality of personal data of its employees (including candidates and applicants), clients, client Customers, business partners and other identifiable individuals that it may receive, use, access, process, transfer or store as part of its business.

This Notice, in consonance with the requirements of Republic Act No. 10173, otherwise known as the "Data Privacy Act" ("DPA") and its applicable rules and regulations ("IRR), serves to inform you of the details of the processing being done by the employing Concentrix Philippines entities ("**Concentrix**" or "**Company**" or "**we**" or "**our**") in relation to and because of your employment with the Company.

A list of the Concentrix Philippines entities may be located in Section 8 of this document which you may use to identify the contact details for your employing entity.

The broad term personal information can be understood as any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual. On the other hand, sensitive personal information refers to personal information:

- (a) About an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
- (b) About an individual's health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such person, the disposal of such proceedings, or the sentence of any court in such proceedings;
- (c) Issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
- (d) Specifically established by an executive order or an act of Congress to be kept classified.

The term processing can be understood as any use or operation which is performed on personal information. That means, anything one can do with personal information, 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, for example, asking a person for information, logging and analyzing network traffic and accessing a database.

To know more about how Concentrix processes personal information, you may refer to the Concentrix Privacy Policy available at <https://www.concentrix.com/privacy-policy>.

For inquiries, you may send an email to the Concentrix Philippines Data Privacy Office at dataprivacy.ph@concentrix.com or our Talent Acquisition Team.

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1. Scope

This Privacy Notice applies to you if you are applying for a position at Concentrix, or you are a current or former employee of Concentrix.

2. Categories of Personal Information

The following table provides a summary of categories of personal information we may process about you. Sensitive personal information, which could lead to infringements of the personal dignity or harm of personal or property safety if leaked or illegally used, will only be processed for specific purposes (see below) and sufficient necessity in order to fulfill the obligations in our role as your employer.

Categories of Personal Information	
Recruiting Data	<p>Category 1: General candidate information, such as:</p> <p>Full name; gender; position; email address; education; position applying for</p>
	<p>Category 2: Additional personal information, such as:</p> <p>Former names; date and place of birth; marital status; private contact information (e.g., private address, private phone no.); identification cards; photos; skills; disability status; any recording (voice, video or any media) of your screening</p>
	<p>Category 3: Passport and similar information, such as:</p> <p>Nationality or citizenship; passport; birth certificate, visa; permit; alien card; alien employment permit; national ID/ foreigner ID; work permit information (e.g., type and status, validity); dependent status and details</p>
	<p>Category 4: Career background, such as:</p> <p>Previous employer, previous positions held; work references; salary packages and pay slips with previous employer; certificate of employments; salary offers; previous work terminations and resignation</p>
	<p>Category 5: Information on IT assets and use, such as:</p> <p>Website and system access (e.g., IP address, log files, websites visited in relation to application); cookies; video images and CCTV (when you visit Concentrix office and recruitment locations)</p>

	Category 6: Additional information you provide on voluntary basis , such as information contained in documents you provide
Sensitive Data	Special categories of personal information ("Sensitive Data"), such as: Information concerning medical health (e.g. vaccination status and details; medical examination report, medical clearances, medical benefits usage, drug test results, etc.); financial accounts and clearances; gender identity and sexual orientation, disability, disciplinary/offense records, police clearances and the like, relevant database checks (in the Philippines and other jurisdictions); government identification cards and numbers (e.g. SSS numbers, Philhealth, HDMF, etc.); licenses (in the Philippines and other jurisdictions)

Concentrix will only process the categories of personal information listed in the table to the extent necessary to fulfill the disclosed purposes for processing such categories of personal information, and it may not be necessary for Concentrix to process all categories of personal information listed in the table above. In any case, we will take care to avoid processing any category of personal information about you, for which such processing is unlawful under applicable law.

We may collect these personal information directly from you (e.g., Concentrix career website and social media channels, during the recruitment and application process or career fairs, etc.) or may obtain these personal information from third parties (e.g., former employers, school linkages, career websites such as Jobstreet, LinkedIn, etc.) as permitted by applicable law.

3. Processing Purposes and Legal Basis, and Consequences

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

Processing Purposes	Legal Basis
<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 and carrying out interviews), verifying your previous employments, 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>	<ul style="list-style-type: none"> • Where appropriate, your consent which meets the requirements of DPA and has been separately obtained (Sections 12 (a) and 13 (a) of DPA). • The processing is necessary for compliance with a legal obligation to which Concentrix is subject to (Section 12(c) of DPA). • The processing is necessary for the purposes of the legitimate interests pursued by Concentrix or by third parties whom your personal information may be disclosed, except where such interests are overridden by fundamental rights and freedoms of the data subject which require protection under the Philippine Constitution (Section 12(f) of DPA). • With respect to Sensitive Employee Data: The processing of the same is provided for by existing laws and regulations (Section 13(b) of DPA).

<p>Complying with applicable laws and employment-related requirements, such as:</p> <p>Verifying your ability to work in the Philippines, administration of employment and immigration requirements</p>	<ul style="list-style-type: none"> • Where appropriate, your consent which meets the requirements of DPA and has been separately obtained (Sections 12 (a) and 13 (a) of DPA). • The processing is necessary for compliance with a legal obligation to which Concentrix is subject to (Section 12(c) of DPA). • The processing is necessary for the purposes of the legitimate interests pursued by Concentrix or by third parties whom your personal information may be disclosed, except where such interests are overridden by fundamental rights and freedoms of the data subject which require protection under the Philippine Constitution (Section 12(f) of DPA). • With respect to Sensitive Employee Data: The processing of the same is provided for by existing laws and regulations (Section 13(b) of DPA).
<p>Communicating with you, such as:</p> <p>Communicating with you about your application, inviting you to recruitment activities, or providing you regular communication about career opportunities with Concentrix.</p>	<ul style="list-style-type: none"> • Where appropriate, your consent which meets the requirements of DPA and has been separately obtained (Sections 12 (a) and 13 (a) of DPA). • The processing is necessary for the purposes of the legitimate interests pursued by Concentrix or by third parties whom your personal information may be disclosed, except where such interests are overridden by fundamental rights and freedoms of the data subject which require protection under the Philippine Constitution (Section 12(f) of DPA).
<p>Responding to and complying with requests and legal demands from regulators or other authorities</p>	<ul style="list-style-type: none"> • Where appropriate, your consent which meets the requirements of DPA and has been separately obtained (Sections 12 (a) and 13 (a) of DPA). • The processing is necessary for compliance with a legal obligation to which Concentrix is subject to (Section 12(c) of DPA). • The processing is necessary for the purposes of the legitimate interests pursued by Concentrix or by third parties whom your personal information may be disclosed, except where such interests are overridden by fundamental rights and freedoms of the data subject which require protection under the Philippine Constitution (Section 12(f) of DPA).

<p>Security of the sites, facilities and assets, such as:</p> <p>Limiting and restricting access to authorized persons, management and protection of company and customer assets and data, monitoring activities and ensuring security within premises through CCTV</p>	<ul style="list-style-type: none"> • Where appropriate, your consent which meets the requirements of DPA and has been separately obtained (Sections 12 (a) and 13 (a) of DPA). • The processing is necessary for the purposes of the legitimate interests pursued by Concentrix or by third parties whom your personal information may be disclosed, except where such interests are overridden by fundamental rights and freedoms of the data subject which require protection under the Philippine Constitution (Section 12(f) of DPA). • The processing is in accordance with the reduced expectation of privacy (in accordance with prevailing laws and jurisprudence). • The processing is part of the security measures implemented by Concentrix to comply with its obligations under the DPA.
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The processing of such personal information for the purposes above may be carried out by the following departments or bodies (inter alia): Human resources, legal, IT, accounting, finance, payroll, sales, operations, delivery, facilities, privacy, and security.

The provision of personal information as described above is partly a statutory requirement, partly a contractual requirement with clients of Concentrix for which you may be engaged to service or work on, and partly a requirement as part of management prerogative of Concentrix and for its conduct of the due diligence before offering employment relationship with you. In general, you are required to provide such personal information, except in limited instances when we indicate that certain information is voluntary. Not providing them 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.

4. Categories of Recipients

As part of the necessary conclusion or performance of the employment contract to which you are a party, or to implement human resources management in accordance with labor rules and regulations, or to ensure that you can service a particular client program/account, it may be necessary to transfer your personal information (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 and each of its affiliates and subsidiaries (Concentrix Corporation and each of its affiliates and subsidiaries, including us, referred to as a "**Concentrix Affiliate**"; collectively, the "**Concentrix Group**") within the global Concentrix Group, which may receive your personal information as necessary for the processing purposes set out above, in particular to conduct recruiting and hiring activities, managing employee benefits, acquiring licenses for you (when required by your work), administering your assignment to client programs, completing employee and company report, providing IT systems and services, and respond to and comply with requests, responses to potential security incidents and legal demands.
- **With certain acquiring or acquired entities:** If the capital stock or assets of Concentrix, being your employing entity, are sold or transferred in whole or in part or if the Concentrix Group is acquiring the capital stock or assets of another entity and integrating such other entity into Concentrix, being your employing entity or the Concentrix Group, (or any similar transaction is being contemplated), your

personal information may be transferred to the other entity (e.g., the new potential 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 service providers, security service providers, background check processors, clinic and medical providers, insurance providers, and various HR service providers, whether affiliated or unaffiliated with the Concentrix Group, will receive your personal information 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 information, and to process the personal information only as instructed.
- **With government and public authorities:** Your personal information including Sensitive Personal Data may be submitted to government and public authorities (even to jurisdictions outside of Philippines) to comply with applicable laws and regulations to which Concentrix or you may be subject of.

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

5. International Transfers

You should expect that there may be recipients identified above which will receive or have access to your personal information, that are located inside or outside the Philippines.

6. Retention Period

Your personal information 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 information is collected, in accordance with applicable data protection laws. When Concentrix no longer needs to use your personal information, 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 information to comply with legal or regulatory obligations to which Concentrix is subject).

In principle, we will delete your Recruiting Data and Sensitive Data 2 years after a negative hiring decision by Concentrix or after you reject an offer from Concentrix. During this period, you may be considered for other positions at Concentrix or another company within the Concentrix Group.

7. Your Rights

- **Right to object or withdraw your consent on processing:** If you have declared your consent regarding certain types of processing activities, you can withdraw this consent at any time with future effect. You may also object to the processing of your personal information. Such a withdrawal or objection will not affect the lawfulness of the processing prior to the consent withdrawal. You can withdraw your consent or object to processing of your personal information by sending an e-mail to dataprivacy.ph@concentrix.com or engaging your Recruitment and Talent Acquisition team.

Note, however, that your withdrawal of your consent or objection to processing may limit our ability to

process your application for employment.

- **Right to be informed:** You have the right to be informed about the processing of your personal information (which is achieved by this Privacy Notice). We may provide you additional Privacy Notice or other communication materials relative to any additional collection and processing by Concentrix, or simply to clarify the details of this Privacy Notice.
- **Right to request access to your personal information:** You have the right to obtain from us confirmation as to whether or not personal information concerning you is processed, and, where that is the case, to request access to the personal information. The access information includes – inter alia – the categories of personal information concerned, the recipients or categories of recipients to whom the personal information have been or will be disclosed and the reasons for such disclosure, the sources of the personal information, the manner by which the personal information is processed, and any automatic processing done. However, this is not an absolute right, and the interests of other individuals may restrict your right of access.

You also have the right to obtain a copy of the personal information undergoing processing. Any request for records may result to reasonable charges.

- **Right to request rectification:** You have the right to obtain from us the rectification of inaccurate personal information about you, unless the request is vexatious or otherwise unreasonable. The recipients or third parties who have previously received the inaccurate personal information such shall be informed of its inaccuracy and its rectification, upon your reasonable request.
- **Right to request erasure or blocking:** You have the right to obtain from us the erasure of personal information concerning you or blocking of the same, and we may be obliged to erase such personal information if such request is supported with grounds and proof allowed by the DPA and IRR such as when the personal information (a) incomplete, outdated, false, or unlawfully obtained; (b) being used for purpose not authorized by you; (c) no longer necessary for the purposes for which they were collected; (d) processed unlawfully or in violation of the applicable rules.
- **Right to data portability:** Where your personal data is processed by electronic means and in a structured and commonly used format, you have the right to obtain from us a copy of such data in an electronic or structured format that is commonly used and allows for your further use.

To exercise your rights please contact us as stated in Section 8 below. We will respond back within a timely manner, and if Concentrix is unable to complete your request to exercise your rights, we will provide an explanation of why the request is not able to be executed. Where a request has been denied, or you sustained damages due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal data, taking into account any violation of your rights and freedoms, you have the right to claim for damages or file a claim with the appropriate agencies in the Philippines.

8. Questions and Contact Information

If you have any questions about this Notice or if you want to exercise your rights as stated above in Section 7, please see below the entity and contact details for your employing entity or you may contact the Concentrix Philippines Data Privacy Team at dataprivacy.ph@concentrix.com.

Entity Name	Address	Questions & Contact Information
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Concentrix Services Pty Ltd ROHQ	7th Floor Exxa Tower Bridgetowne, C5 Road, Ugong Norte, Quezon City	<p>Michael Dana N. Montero Data Protection Officer Philippines Data Privacy Email: dataprivacy.ph@concentrix.com</p>
Concentrix Services Philippines, Inc.	18th Floor Giga Tower Bridgetown IT Park, C5 Road, Ugong Norte, Quezon City	
Concentrix Services B.V. Philippine Branch (formerly, Concentrix Services Corporation)	18th, 20th, 21st Floor Tera Tower Bridgetowne Along C-5 road Ugong Norte, Quezon City,	
Concentrix Daksh Services Philippines Corporation	Building F, AyalaLand Technohub, Quezon City,	
Concentrix CVG Philippines, Inc.	14/F to 25/F Ayala North Exchange, Tower 2, 6798 Ayala Avenue cor. Amorsolo and Salcedo Streets, Brgy. San Lorenzo, Makati City	
Concentrix CVG Singapore Holdings Pte Ltd ROHQ	25th Floor Ayala North Exchange Tower 2, 6798 Ayala Ave. cor. Amorsolo and Salcedo Streets, Makati City	
Concentrix CVG Malaysia (Philippines) Sdn Bhd Philippine Branch	23rd Floor Ayala North Exchange Tower 2, 6798 Ayala Avenue corner Amorsolo and Salcedo Streets, Makati City	
Encore Receivable Management, Inc.	Glorietta 5, East Street, Ayala Center, Ayala Avenue, Makati City	
Concentrix SREV Philippines, Inc.	22nd Floor Ayala North Exchange Tower 2, 6798 Ayala Ave. cor. Amorsolo and Salcedo Streets, Makati City	
Webhelp Philippines, Inc.	25 th Floor Ayala North Exchange Tower 2, 6798 Ayala Ave. cor. Amorsolo and Salcedo Streets, Makati City	