

**Privacy Notice for California Resident Independent Contractors**

**This Privacy Notice applies to Genpact Independent Contractors who are California residents. This notice is provided as a means of complying with the California Consumer Privacy Act of 2018 (“CCPA”).**

Genpact and our affiliated companies worldwide (“Genpact”) are a global professional services firm focused on delivering digital transformation for our clients. As part of being an Independent Contractor on behalf of Genpact, we will need to collect your personal information. The purpose of this notice is to make you aware of the categories of personal information we collect and the purposes for collecting that information. If you have any questions or concerns about this privacy notice or your personal data, please reach out to your respective agency and/or [DPO.Genpact@Genpact.com](mailto:DPO.Genpact@Genpact.com).

**Categories of Personal Information Collected & Purpose(s) for Collection**

Genpact collects and retains certain personal information about you.

In general, Genpact must collect and process information about you for normal staff contracting purposes. The information we hold and process will be used for our management and administrative uses only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully, and appropriately during the tenure of your contract for services with Genpact, when the contract terminates, and after you have left. This includes using your personal information to enable us to comply with your contract and any legal requirements, pursue our legitimate business interests, and protect or defend our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our legal obligations or fulfill our contractual obligations with you and we will tell you about the implications of that decision.

The personal information collected will include:

Category	Examples	
Identifiers	Name, alias, date of birth, personal and/or business email address, personal and/or business telephone number, home address, contact details, Internet Protocol address, unique personal identifier, government-issued identification numbers, photographs, demographic information, or other similar identifiers.	<p>The information requested is necessary for the performance of our obligations under your contract. If you do not provide the information requested, we will be unable to pay you the agreed compensation.</p> <p>We keep contractor records consistent with industry practices including information relating to work history with Genpact, CV, references, absences and accidents and equal opportunities monitoring. We keep a copy of your contract and any correspondence with you in the event of termination of your contract. It is our legitimate business interest to process these records.</p>
Educational and Professional Details	Higher education, certifications, previous employment history, professional skills.	This information is necessary to confirm your identity through background checks and assess your qualifications for your role at Genpact.
Background Check Reports	Educational and employment checks in accordance with	Where permissible under local law, we engage third-party vendors to carry out

	applicable law. This may include information on criminal convictions and offenses (if applicable).	background verification checks including identity verification, educational verification, employment verification, and criminal verification to pursue the legitimate business interests of the company and to comply with applicable legal requirements.
Compensation Information	Details of salary, bank account details, tax status, income tax and other records relating to time off and other leave, and working time records.	This information is gathered to ensure your invoices are paid on time and performance is tracked for normal business purposes.
Information about your performance at the workplace	References from your previous workplace as well as opinions expressed by your colleagues, supervisors, or clients of Genpact.	We process personal information as part of performance review processes and in relation to review of fulfilment of the requirements of the contract that you have with Genpact. We also keep contractor learning and development records. It is in our legitimate business interest to process these records.
Travel and Expenses Information	Passport, visa details, corporate card transactions, expense details, supporting bills.	From time to time, we may process personal information and engage travel and immigration vendors to facilitate corporate travel, location transfers, validate expenses and relevant bills/ supporting in line with our Travel, Mobility and Expense policies. It is in our legitimate business interest to process these records, in pursuit of our legitimate business interests to maintain accurate financial records.
Learning and Development Information	Training, certifications, attendance and assessment records.	We gather this information in order to understand how Genpact contractors are progressing with internal training, which helps in evaluating job performance and assessing your fulfilment of the requirements of the contract with Genpact.
Information collected as part of workplace or work surveillance and monitoring	Video surveillance data, physical access logs, activity, system and transactional logs from applications, systems, and communication channels.	We monitor and record computer use, and in certain cases, corporate telephone use and also carry out CCTV monitoring of key areas, as detailed in our Interception and Surveillance policy. We also keep records of your hours of performing services for Genpact using our access control system, as mentioned in our Interception and Surveillance policy. It is part of our legitimate business interest to process such records for the safety and security of the company and its staff, and in some cases we will be legally required to do so.
Health Information	Physical examination results, accident and injury reports, disability status	Where necessary, we may process sensitive personal data relating to your health in order to comply with our

		health and safety and occupational health obligations – to consider how your health affects your ability to perform the contractual services and whether any adjustments to your services might be appropriate. Genpact will process such information only based on your explicit consent or as otherwise legally permitted, for example, where it is necessary for carrying out obligations or exercising rights under contract law, to protect your vital interests, for the establishment or defense of legal claims, to facilitate medical diagnosis/assistance/treatment, and/or for the assessment of your working capacity.
Protected classification characteristics under California or federal law	Age, race, marital status, nationality, citizenship, gender, religion or creed	We may process sensitive personal information relating to your racial or ethnic origin or religious beliefs, in each case, for the purposes of monitoring the existence or absence of equality of opportunity or treatment between groups of individuals.

This information is and will be collected by us in a number of ways through multiple channels, at the time your contract for services commences with our organization and over time during our relationship with you:

- Directly from you (via on-boarding online application(s), telephone, email and in person, or in circumstances in which you have been contracted by Genpact or expressed an interest in future contract related opportunities);
- Through referrals from our employees, contractors and business contacts;
- From third parties (through recruitment agencies and background verification agencies), which may also include public sources such as professional networking platforms.

Some other reasons why we collect the above categories of personal information (in addition to those mentioned above) include:

<b>Purpose</b>	<b>Details</b>
Discipline, grievances, or termination	From time to time, we may need to process personal information in connection with discipline, grievances, or termination of your services. It is our legitimate business interest to process these records.
Audit compliance	We may process personal information as part of our audit processes and engage third party auditors from time to time. We have ensured that only personal information absolutely necessary is processed during such audits in order to comply with applicable laws and to satisfy our legitimate business interests.

New opportunities	We may retain relevant documents containing your personal data for future related contractual opportunities, in pursuit of our legitimate business interests.
Disclosure of business contacts, CV, and background screening information to clients	Where required by clients and necessary for a business purpose.
Prevention of fraud	We may process your personal information for the purpose of fraud prevention in pursuit of the legitimate business interests of the company.
Potential criminal activity	We may process your personal information for the purpose of detecting and reporting potential crimes where permissible or required under national law.
Documents produced by contractors	We may store documents and records that are produced by you and your colleagues which contain your personal information, such as your name, details of your role and your CV, and these may be shared with clients in the course of carrying out your duties and the business of the company, in pursuit of our legitimate business interests.

You may refer to the [Global Privacy Notice](#) for more information on Genpact policies and practices around handling personal data.

This processing is necessary for Genpact to pursue our legitimate business interests, to keep our business data and your personal data secure and confidential, and in some cases to protect or defend our legal rights.

In the future, if we intend to process your personal data for a purpose other than the purposes mentioned above, we will update this notice and, if necessary, obtain your consent.

### **Changes to this Privacy Notice**

This privacy notice was last updated in July 2021 and we will notify you of changes we may make to this privacy notice where required, however we would recommend that you look back at this notice from time to time to check for any updates.