

Privacy Notice for California Resident Employees

This Privacy Notice applies to Genpact employees 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 your employer, Genpact will need to collect your personal information. 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 about this privacy notice or your personal data, please contact us at support.employee@Genpact.com or DPO.Genpact@Genpact.com.

Categories of Personal Information & Purpose(s) for Collection

Genpact collects and maintains certain personal information about you as a result of your employment with Genpact and as part of the administration of general employee records.

Genpact must collect and process information about you for normal employment 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 recruitment process, your employment, when your employment ends, and after you have left. This includes using your personal information to enable us to comply with your employment 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 includes:

Category	Examples	Purpose(s) for Collecting
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.	The information requested is necessary for the performance of our obligations under your employment contract. If you do not provide the information requested, we will be unable to pay your salary, provide or register you for benefits or to facilitate claims for benefits. This information is also collected for administration purposes. We keep employment records consistent with industry practices including information relating to employment history, CV, references, absences (for example, annual leave and sickness or injury), accidents, and equal opportunities monitoring. We keep a copy of your employment contract and any correspondence relating to you in the event you are terminated. It is in our legitimate business interests and/or necessary for the performance of our obligations under employment law to process these records.
Information collected during interviews	Audio & video records of the interview (in the event that telephone interviews or video enabled interviews took place) as well as	This information is collected for talent assessment and to evaluate your suitability for a leadership program or new role.

	comments noted by our interviewers.	
Work environment details	Your hiring experience, engagement with HR, your manager & co-workers, what work you're assigned, growth opportunities.	This information is collected to understand and improve company culture.
Educational and professional details	Higher education, certifications, previous employment history, professional skills.	This information is necessary to confirm your identity through background checks & assess your qualifications for your role at Genpact.
Background check reports	Educational and employment checks in accordance with applicable law. May include information on criminal convictions and offenses (if applicable).	Where permissible under local law, we engage third-party vendors to carry out 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 and benefits information	Details of salary and benefits, name of family members or dependents for benefits enrollment, bank account details, salary reviews, records relating to time off and other leave, working time records.	This information is gathered to ensure your salary is paid on time, your benefits are allocated, and performance is tracked for normal business purposes. We are also legally obligated to pay certain taxes on your earnings and we will use the information provided by you to meet our legal obligations.
Childcare benefits	Information related to your child such as name, date of birth, birth certificate, educational institution, tuition fee and bills.	Genpact would need to process the personal data of your child should you elect to use any childcare benefits for which you may be eligible. If you do not provide the information requested, we will be unable to provide or register you for benefits or to enable payment of claims for benefits.
Information about your performance at the workplace	References from your previous workplace, performance evaluations, as well as opinions expressed by your colleagues, individuals whom you manage, supervisors, and clients of Genpact.	We process personal information as part of performance review processes and in relation to compensation, rewards, and benefits. We also keep employee 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, facilitate location transfers, validate corporate card expenses and relevant supporting activities in line with our Travel, Mobility and Expense policies. It is in our legitimate business interest to process these records.
Learning and development information	Training, certifications, attendance and assessment records.	We gather this information in order to understand how Genpact employees are progressing with internal training, which helps in evaluating job performance and assessing career advancement.

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, as permitted under applicable laws, 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 work 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, including its assets and its staff, and in some cases we will be legally required to do so.
Business intelligence and analytics/Email monitoring	Workplace analytics tools/ third party email analytics tools	<p>We may use workplace analytics tools to monitor your level of engagement and key performance indicators of the services Genpact provides to its clients which will be analysed only at an aggregate level. The data we receive shall be used for understanding the productivity of the team or function you are a member of and other performance indicators, such as accuracy of processing and to better serve our customers. It is in our legitimate business interest to conduct such analysis, gather business intelligence and manage productivity and performance. We use carefully selected third-party email analytics tools in order to understand the ability of our employees across the company to come together in engaging in different projects, as permitted under applicable laws. The data we receive through email analytics shall be used to monitor engagement and collaboration patterns of employees based on various parameters, such as team members they work with and projects they work on. It is in our legitimate business interest to conduct such analysis to help improve employee productivity. We also send targeted and relevant emails to employees to effectively distribute organizational information and leadership messages. In order to assess the effectiveness of organizational information and leadership messages, we gather certain metrics (such as email open rate, read rate, and time spent on reading such emails) to understand and improve employee's engagement with such emails.</p> <p>We have implemented the following specific analytics tools/functions that are aimed at improving employees' overall engagement and satisfaction. We have implemented adequate controls to ensure security and confidentiality of your personal data and full compliance with all applicable data protection principles:</p> <p>Workplace Analytics (WpA): it is our legitimate interest to implement WpA, in order to gain aggregated insights that can help us improve employees' well-being, especially by addressing the negative impact caused by the current Covid-19 lockdowns and the necessity to work from home, which led to a loss of personal connections between colleagues, fatigue, loss of productivity and effectiveness, loss of employee engagement. For example, we could use insights to: (i) provide aggregated personalized benchmarks to managers and senior leaders, to help them</p>

		<p>improve their network and keep in touch with team members, (ii) understand whether the work from home situation led to meetings and longer hours, which could be tied to increased fatigue, (iii) understand trends regarding diversity and inclusion to assess whether people are keeping in touch with each other. Furthermore, a bot could send automatic invites for short meetings between yourself and other employees that you work with (<i>based on your preferences and the 'proximity' calculated</i>), in order to replicate the spontaneous 'coffee break encounters' and promote social interaction in the workplace via remote means.</p> <p>WpA uses basic business related personal data, such as HR data (<i>Personal ID, Effective Date, Manager ID, COE_CODE, COE, Band, Level</i>) and O365 metadata (<i>email headers, team chat headers and calls, meeting headers - excluding any communication content</i>). Such insights will not be used for individual level employee monitoring, performance reviews and any such related purposes.</p> <p>HR Analytics function: is our legitimate interest to implement the HR Analytics Function, to correlate data from multiple data points (<i>Genpact's HR systems, such as HRMS, Ofcon, Attrition datawarehouse, Genome, AMBER etc.</i>) to come up with end to end insights (<i>in the form of aggregated reports</i>) that add value to the organization and assist the senior leadership in taking better people related decisions within Genpact. The ultimate goal is to ensure better employee engagement, productivity, effectiveness, and overall employee experience.</p> <p>For the purpose of extracting the insights, HR Analytics shall process: (i) basic employment information such as name, position, supervisor, OHR ID, band, date of joining, employer entity, (ii) Engagement data from AMBER, (iii) Learning scores and profiles from GENOME, (iv) Recruitment data, such as prior experience, qualifications, skills, (v) Goal sheets and CI2 performance ratings (<i>including self and manager appraisals</i>) from iPerform. In summary, the specific projects within the HR Analytics Function may consist of: (i) Genome – Amber analytics to understand correlations between learning scores and engagement, (ii) CI square analytics to understand the attributes with highest impact on potential, as well as where the highest gaps between self and manager ratings exist, (iii) sales force analytics to understand which factors are correlated to success of our sales workforce, (iv) Amber NLP analytics to understand the most predominant topics and themes. All projects within the HR Analytics Function consist exclusively of aggregated statistical reports without any</p>
--	--	--

		attribution to individuals. No use of insights for any other purposes such as performance review.
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 do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay, health insurance, or life insurance benefits.
Accommodation for disabilities	In certain instances, we may receive or request information related to health, such as disability status, in order to make any necessary accommodations related to your work at Genpact.	This information may be collected to assist with workplace and desk setup, physical accommodations, allow for a proper ergonomic evaluation, etc.
Protected classification characteristics under California or federal law	Age, race, marital status, nationality, citizenship, gender, religion or creed.	We may process sensitive personal information as permitted under applicable laws, relating to your racial or ethnic origin or religious beliefs, in each case, for the purpose of ensuring compliance with Equal Employment Opportunity Commission (EEOC) reporting.
Biometric information	Photograph & facial scans	This information may be collected when you first join Genpact and facial scans may be used to grant you access to Genpact premises in the event you are not able to present your Genpact access card.
IP security details	Cloud access security related information such as the IP address of your connected devices used for work purposes.	This information is collected in the event you need to work remotely.
Your emergency contact details & information about your beneficiaries and emergency contacts	Your personal phone number, email address and your approximate location that you may choose to share with Genpact. The names, contact information (including phone number and address) of those you assign as beneficiaries or emergency contacts within your employment documents.	This information is collected so that Genpact may contact you in case of an emergency or crisis, such as the COVID-19 pandemic. During such an emergency, we may ask you to confirm your well-being and your whereabouts in order for us to monitor your health and safety. We may also be required to share your personal data with our clients or their third-party vendors to enable remote working for you in the context of emergency situations (such as the COVID-19 pandemic). This would be done to enable the client to send you the equipment necessary for working remotely or for ensuring effective communication. Your personal data will be shared on a strictly necessary basis and only for so long as it is necessary in accordance with applicable data protection laws. Additionally, in case of an emergency, accident, or death, Genpact would reach out to your emergency contacts and assigned beneficiaries. It is up to you to notify these individuals that you have shared their personal information with Genpact.

This information is and will be collected by Genpact in a number of ways through multiple channels, at the time you join our organization and over time during our relationship with you:

- Directly from you (when you contact us through Human Resources via on-boarding online application(s), telephone, email or in person);
- 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:

Purpose	Details
Discipline, grievances, or dismissal	From time to time, we may need to process personal data in connection with disciplinary, grievance, and dismissal processes. 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.
Leadership development programs	In the event you are nominated for select leadership development programs at Genpact, we may ask you to take additional aptitude and leadership assessments to evaluate your suitability for such programs. Results of such assessments are utilized only for purposes of selection to the program.
New employment opportunities	If you have expressed an interest in working for us in the future (e.g., under a temporary contract) we may retain your employment records and related documents containing your personal data for future employment-related 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.
Verifying compliance with Genpact policies	We may process your personal data for the purpose of assessing and ensuring employee compliance with the various internal Genpact policies 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 applicable law.
Documents produced by employees	We may store documents and records that are produced by you and your colleagues which contain your personal data, for example your name, details of your role and your CV, as permitted under applicable laws, 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. Additionally, from time to time Genpact publishes whitepapers, reports, research

	material, and articles on industry topics which may be shared internally or externally (for example, on the Genpact website). If you contribute as an author or expert, the written material may contain your personal data such as your name, designation, and Genpact email address.
--	--

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 April 2021. When required, we will notify you of changes, however we would recommend that you look back at this notice from time to time to check for any updates.