

HCL TECHNOLOGIES "GLOBAL ETHICS HELPLINE" DATA PRIVACY NOTICE ('Notice')

Effective Date: 1st January 2024

INTRODUCTION

HCL Technologies Limited is committed to protecting and securing the privacy and confidentiality of Personal Data which it collects and processes. This Notice outlines and explains how HCL Technologies Limited (hereinafter collectively referred as 'HCLTech', 'we', 'our', 'us') will protect your privacy by processing your Personal Data in accordance with applicable privacy legislation(s).

"Global Ethics Helpline" (hereinafter referred to as 'Portal') is a grievance management portal for HCLTech, which also serves as whistle blowing channel. The Portal with its phone lines is operated by an independent third-party provider OneTrust (formerly Convercent) on behalf of HCLTech. Your report will first be received by One Trust and then passed on to HCLTech's investigator(s) or case manager(s), for follow-up and investigation. All reports received by One Trust and HCLTech are treated with strict confidentiality.

What Does This Notice Cover?

The aim of this Notice is to provide you with information on what Personal Data we process, why we process your Personal Data, how we process your Personal Data (including details on the principles we will abide by), as well as informing you of certain rights that you may be able to exercise on your Personal Data with regards to the Portal. This notice is supplemented by local privacy terms that may apply to your jurisdiction. More information about how HCLTech processes your personal data including your rights, and how to exercise them, is set out in our Global Employee Privacy Notice for HCLTech employees hosted on our intranet portal, or the HCLTech Privacy Statement for anyone else. If you are an HCLTech employee in California, please refer to the California Employee Privacy Supplement Notice on the MyHCL site. If you are not an HCLTech employee and are a California resident, please refer to HCLTech's Privacy Policy, available at [CCPA Statement | HCLTech](#) for more details about your rights.

What Personal Data Do we Process?

For the purposes of this Notice, 'Personal Data' means any information about you from which you can be identified (whether derived from that information on its own or when combined with other information that we or another party may hold about you).

This may include but may not be limited to the following:

General Personal Data:

- Personal data such as: your first name, last name, full name, personal e-mail address, contact information.
- Professional data, that you might provide through your grievance, as applicable, such as: your designation, employee ID, Reporting Manager identification, current working or personal location, HR partner details, Date of Joining HCLTech, Department, Organizational e-mail address and any other information that may be required for the purpose of facilitating the investigation(s) of your grievance or complaint.
- Other information which may be provided by you as a User of the Portal such as personal contact details, photographs, documents, location details etc.

Special Categories of Personal Data:

HCLTech will only process Special Categories of Personal Data in limited circumstances and only where we are permitted to do so under applicable legislation(s) or if such information is provided by you voluntarily and/or is necessary to facilitate the investigation of the grievance raised by you.

Anonymous complaint/grievance:

You may choose to remain anonymous towards the organization when you file a complaint/grievance through the Portal. Your login data will not be disclosed/shared with us, but it will be stored in the Portal.

How we collect your Personal Data?

Aside from the data that we collect through OneTrust, we may collect your Personal Data indirectly from other sources, when it is strictly necessary for the investigation process. These sources may include but are not limited to data collected from HCLTech internal databases, other employees, prospective employees, ex-employees, interns, vendors, clients or their employees, or any other person depending on your grievance.

Why we process your Personal Data?

We process your Personal Data for specified purposes and on the following legal grounds, for the various situations which may arise during the course of the investigation related to your grievance:

- i) As it may be necessary for preserving our or a third party's legitimate interests (please see 'How do We use your Personal Data?' section below.);
- ii) As it is, or if it becomes, necessary to comply with Whistleblower laws that might apply to your region or any other legal obligation(s), including but not limited to, any local law(s), to the extent of the applicability of such law(s);
- iii) Data processing based on your consent.

Further to establishing valid legal ground(s) for processing your Personal Data, we also follow principles of data necessity, proportionality, minimisation and lawfulness, fairness, transparency amongst others.

How We Use Your Personal Data?

The purposes for which we use your Personal Data include, but are not limited to:

- To respond to your enquiries and comments, and provide customer service and support with regards to your grievance and the associated investigations;
- To send alerts, updates, and other communications in relation to the reported grievance;
- To investigate complaints and prevent fraudulent activities, relevant systems, and other illegal activities.
- To provide recommendations to HCLTech Management regarding any findings on the investigations conducted.
- To comply with any request/ notice received from legal authority/ local body in relation to the grievance reported.

Please note, in some circumstances we may share your Personal Data with independent third parties that may qualify as Controllers for the purposes of the facilitation of the investigation.

Otherwise, all third parties are Processors acting on the instructions of HCLTech. Wherever we engage a Processor, we require contractual assurances that such Processors have implemented appropriate safeguards and controls in relation to the protection of your Personal Data. In addition to the third parties' legal obligations applicable to them, we require that such third parties are also contractually obligated to safeguard your Personal Data. Ongoing oversight is maintained on the relevant processing activities being carried out by the third party.

How Long Do We Retain your Personal Data?

We retain your Personal Data for as long as it is necessary to fulfill the purposes for which it is processed. We follow a deletion process designed to ensure that your Personal Data is safely and completely removed from our network or retained only in anonymized form. We try to ensure that we protect your information from accidental deletion. Because of this, there could be some delay between when data deletion is initiated and when data is deleted from our active and backup systems / network / servers

Is Your Data Transferred Across International Borders?

HCLTech is a truly global organisation, so your Personal data may be transferred for any of the above stated purposes to one or more HCLTech group entities and/or third parties in other jurisdictions. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

What are your rights and how can you exercise them?

You may have several rights in relation to your Personal Data as per applicable privacy and data protection laws, including but not limited to the right to information and access and right to delete. Please note, these rights are subject to exemption(s) and may not apply in all circumstances.

You can use the following channels to exercise your rights or request more information about your rights:

- Submit your requests on the [Data Subject Request Portal](#);
- Contact HCLTech's Privacy Office via privacy@hcl.com for general queries.

How Do We Update This Notice?

We may update this Notice from time to time. We will post any updated version of this Notice on the Portal. We may also communicate changes to this Notice to you by email or by other necessary mean(s), if need be.

Who can you contact?

If you have questions, complaints or concerns about the way we process your data, you can reach out to us as follows:

- If you are an EU/EEA or UK data subject, and you have concerns about how your Personal Data has been processed then you can contact the HCLTech's Data Protection Officer using hcldpo@hcl.com
- If you are a data subject from India, and you have any concerns about how your Personal Data has been processed then you can contact the Grievance Officer for India (Prashant Yadav) at grievance-india@hcl.com
- If you are a data subject residing outside of the EU/EEA, UK or India, and you have any concerns about how your Personal Data has been processed then you can contact the Global Privacy Office online via privacy@hcl.com

If you are not satisfied with our response, you also have a right to lodge a complaint with a data protection supervisory authority in the jurisdiction of your habitual residence, place of work or place of the alleged infringement with regards to your Personal Data.