

Recruitment Privacy Notice

1. Introduction and Scope

This Recruitment Privacy Notice ("Notice") is issued on behalf of Simplus US, which is part of Infosys Nova (together, "we," "us," or "Simplus"). Each Simplus entity that operates a recruitment process in which you participate acts as the data controller responsible for your personal data in connection with that process. If you apply for a job at any other Simplus entity, please refer to their corresponding privacy statement.

This Notice explains how we collect, use, store, share, transfer, and protect your personal data when you apply for a position with any Simplus entity, or when we otherwise process your data in connection with our recruitment activities. This Notice applies to all job applicants and candidates (whether internal or external), individuals whose details are submitted by recruitment agencies or employee referral programs, and individuals who submit speculative applications or expressions of interest. This Notice does not cover the processing of your personal data after you commence employment with a Simplus entity. If your application is successful and you join Simplus, you will be provided with a separate Employee Privacy Notice that describes how your data is processed during your employment.

2. Personal Data We Collect

We collect and process the following categories of personal data about you in connection with our recruitment activities. Identity and contact data. Your full name, address, personal email address, and personal telephone number (optional). Application and professional data. Performance-based evidence of the qualifications required for the position, curriculum vitae or resume, cover letter, educational history and qualifications, employment history, and any other information you choose to include in your application materials. The provision of further personal data beyond the minimum required fields is optional. During the application process, further personal data necessary for the initiation and conclusion of an employment contract may be transmitted to us by other means, if necessary (e.g., via email) to which this Privacy Notice will apply.

3. How We Collect Your Data

We collect your personal data from the following sources: Directly from you. The majority of personal data we process about you is collected directly from you when you submit an application through our online application form, when you attend interviews or assessments, and when you correspond with our recruitment team. From recruitment agencies. Where you have applied through a recruitment agency, the agency may share your personal data with us in connection with your application. From publicly available sources. We may collect professional profile

information from publicly available sources for the purpose of identifying and contacting potential candidates, where permitted by applicable law.

4. Purposes of Processing

We process your personal data for the following purposes in connection with our recruitment activities: Managing the recruitment process. Receiving, reviewing, and evaluating applications; shortlisting candidates; scheduling and conducting interviews and assessments; communicating with you about the status of your application; and making hiring decisions. Extending and managing offers. Formulating and communicating offers of employment; negotiating terms; and facilitating pre-boarding activities for successful candidates. Compliance with legal obligations. Complying with applicable employment, immigration, and data protection laws; and establishing, exercising, or defending legal claims.

5. Legal Bases for Processing

The legal bases on which we rely for processing your personal data are established under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA). Under these laws, we process your personal data for business purposes such as evaluating job applications, conducting interviews, and making employment offers. We also process your data to comply with applicable legal obligations, including statutory retention requirements. Additionally, we may process your personal data for legitimate business interests, such as improving recruitment processes and candidate evaluation, provided these interests do not override your rights and freedoms. Where your consent is required, it will be freely given, specific, informed, and unambiguous, and you will be informed of your right to withdraw consent at any time.

When processing Sensitive Personal Information under the CPRA, we will ensure compliance either through your explicit consent or as permitted for employment-related purposes under California law. Processing is carried out only to fulfill obligations and exercise specific rights in the context of employment and social security, as authorized by applicable regulations.

For applicants located in the Philippines, the legal basis for processing your personal data is established under the Philippine Data Privacy Act of 2012. We process your personal data for legitimate purposes related to recruitment, employment, and compliance with legal obligations, ensuring your rights as a data subject are protected under Philippine law. Where consent is required, it will be obtained in a manner that is freely given, informed, and explicit, and you retain the right to withdraw consent at any time.

For applicants located in Australia, the legal basis for processing your personal data is governed by the Australian Privacy Act 1988 (Cth). Your personal data is

processed for recruitment-related purposes, compliance with employment and legal obligations, and legitimate business interests, consistent with the Australian Privacy Principles (APPs). Consent will be sought when required, and you have the right to access and correct your personal information, as well as to withdraw consent where applicable.

6. Automated Decision-Making and Profiling

An automated decision-making does not take place. No hiring decision is made solely by automated means without meaningful human review and oversight.

7. Who We Share Your Data With

Your personal data may be shared with the following categories of recipients in connection with our recruitment activities: Internal recipients. The People & Culture department, Recruitment Team, HR, the supervisor of the position for which you have applied, and management. In the context of recruiting, we use the external recruiting service provider Workday. Workday acts as a data processor on our behalf. All information on data processing by WorkdayWe do not sell your personal data.

8. International Transfers of Your Data

The personal data processed on our behalf, and where required it will stored outside US. Where your data is transferred to Simplus subsidiaries in Australia and Philippines, appropriate transfer mechanisms are in place. When sharing the data with our parent legal entity, in India, we will rely on Binding Corporate Rules as the transfer mechanism, and you can access the link [Binding Corporate Rules: Our Commitment to Privacy for International Data Transfers](#) for more information. There is no intention to transfer personal data of applicants to any other third country or international organization as part of the application process beyond what is described in this Notice. All international transfers are subject to appropriate safeguards in place. .

9. How Long We Keep Your Data

We retain your recruitment data for the following periods: Unsuccessful candidates. If the applicant is not selected in the course of the application process or if they withdraw the application themselves, the personal data will be deleted after 4 months following the conclusion of the application process, unless the applicant has expressly given their consent to further processing or longer statutory retention periods exist. Successful candidates. If an employment contract is concluded, your recruitment data will be transferred to your employee record and will be retained in accordance with Simplus's employee data retention policy. Detailed information about the processing of personal data during the

employment relationship will be provided in connection with the employment contract.

10. Your Rights

You have rights regarding your personal data under applicable U.S. privacy laws, including the California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA). These rights may include: the right to know what personal information we collect, use, disclose, and sell; the right to access your personal data; the right to request deletion of your personal information; the right to correct inaccurate personal information; the right to opt out of the sale or sharing of your personal information; the right to limit the use and disclosure of sensitive personal information; and the right to non-discrimination for exercising your privacy rights. You may also have the right to withdraw consent where applicable. The provision of personal data is not required by law or contract, but it is necessary for the conclusion of an employment contract. You are not obligated to provide your personal information; however, if you choose not to provide it, we may not be able to consider your application. If you wish to exercise any of these rights, please contact privacy@infosys.com.

Australia: If you are located in Australia, you have rights under the Australian Privacy Act 1988 (Cth), including the right to access and correct your personal information, and to make a complaint if you believe your privacy rights have been breached. You may request access to or correction of your personal data by contacting us at privacy@infosys.com. Any privacy complaints will be handled in accordance with our privacy policy and the requirements of the Privacy Act.

Philippines: If you are located in the Philippines, you have rights under the Data Privacy Act of 2012, including the right to be informed, the right to access and correct your personal data, the right to object to processing, the right to erasure or blocking, the right to data portability, and the right to lodge a complaint with the National Privacy Commission. For any requests or concerns regarding your rights, please contact privacy@infosys.com.

11. Data Security

We take the security of your personal data seriously. Your recruitment data is protected by comprehensive technical and organizational security measures. Access to your recruitment data is restricted to authorized personnel on a need-to-know basis.

12. Cookies and Tracking Technologies

Where cookies are used on our careers website or application portal, a cookie notice and consent mechanism will be provided in accordance with applicable law. No

third-party advertising or analytics cookies are deployed within the candidate portal.

13. Third-Party Links

Our careers website or job postings may contain links to third-party websites, including professional networking platforms and job boards. We are not responsible for the privacy practices of those third-party websites. We encourage you to read the privacy notices of any third-party website you visit.

14. Children's Data

Our recruitment activities are directed at individuals who are of legal working age in the applicable jurisdiction. We do not knowingly collect personal data from individuals below the minimum legal working age. If you believe that we have inadvertently collected data from a minor, please contact us immediately at the details provided below.

15. Changes to This Notice

We may update this Notice from time to time to reflect changes in our recruitment processes or applicable law. Where we make material changes, we will publish the updated Notice on our careers website and, where practicable, notify active candidates.

16. Contact Information

Data Protection Contact: [Name and Contact Details]. Local HR Representative: Contact details for your local HR team are available on the Simplus careers website or by contacting your local recruiter.

17. Complaints

If you are not satisfied with how we handle your personal data or with our response to a request you have made, you have the right to lodge a complaint with the relevant supervisory authority in your jurisdiction.